



## Policy on ESG Sustainability

Version 2

Approved by the Board of Directors of  
Home Credit India Finance Private Limited  
On June 19, 2023

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Whole Time Director/ Chief Executive Officer

## Document Information

<u>Name:</u>	Policy on ESG Sustainability
<u>Type:</u>	Company Policy
<u>Area:</u>	ESG, CSR and Community Development and Business Ethics,
<u>Key concepts:</u>	ESG, Code of Conduct, Corporate Social Responsibility, Digital Adaptation, Diversity and Inclusion, Employee Engagement, ESG Disclosures, Financial Inclusion, Financial Literacy, Reducing Environmental Impact, Responsible Lending, Shared Value Creation, Sustainability, Corporate Values and Beliefs, Sustainable Supply Chain
<u>Responsible Function:</u>	HCIN - Legal & Governance

## Objective

This policy provides a framework for Home Credit India to implement sustainable business practices in the context of Environmental, Social and Governance (ESG) principles as guided and advised by Group.

## Scope of Application

<u>Applicable to:</u>	Home Credit India (HCIN)
<u>Effective from:</u>	01 April 2021

## Document History

Version Number	Date of Issue	Reason for Change
HCIN/ ESG/ 2021/ v.1	30.06.2021	First issue of the document
HCIN/ ESG/ 2021/ v.2	19.06.2021	Annual review of Policy

## 1 Objective, Purpose and Scope

### 1.1 Objective

The objective of the policy is to provide a framework for HCIN to implement sustainable business practices on Environmental, Social and Governance principles.

ESG has a significant positive impact on fundamental business issues relevant to the long-term success of any company across industries. Hence, the Policy would provide framework in maintaining:

- a) The highest standards of business conduct,
- b) Customers' rights and their interests to borrow safely,
- c) Diversity and inclusion principles,
- d) lowest possible environmental footprint (To manage and reduce HCIN's impact on the climate through optimizing its internal operations and as part a of its business in offered services and products) and development of local communities.

As a responsible lender, HCIN focus on financial inclusion and financial literacy enhancement.

Implementing ESG Practices, will strengthen and enable HCIN to ensure "license to operate" earned from societies across its operations in country.

HCIN will also ensure environmental and social safeguards as defined by the applicable Indian legislation.

### 1.2 Purpose

The purpose of this Policy is to:

- a) define the company's overall approach to ESG principles. The Policy would give framework and guidance for key ESG principles and priorities that HCIN should mandatorily reflect in their strategic planning and execution.
- b) make corporate social responsibility part of sustainable development of the society.
- c) make sure the company's key ESG principles function as a system. Beside implementing the principles set out in this Policy, HCIN will be monitoring and ensuring compliance with the letter and spirit of the law, international norms, ethical standard and HCIN meets the interest and respects the needs of customers.
- d) lay down ESG governance principles, reflecting the fact that Sustainable Practices are an integral part of strategic planning of HCIN, and that the execution and monitoring of Sustainable Practices requires a cross-functional approach.
- e) provide a mechanism for collecting data.
- f) provide a solid base for ESG Practices within the HCIN and to develop them further in the future.

### 1.3 Scope

Our business is deeply knotted with environmental, social, and governance (ESG) concerns. It makes sense, therefore, that a strong ESG proposition can create value. The Policy is applicable to HCIN, internal functions and its employees.

#### 1.4 Related Documents

- a) The Policy shall be read together with the below stated Company Policies/ regulations describing additional reference and supporting documents for Policy implementation:
  - i. Lawful and Ethical Business Operation
    - Business Strategy,
    - Code of Business Conduct, Ethics and Vigil Mechanism,
    - Corporate Governance Policy,
    - Anti-Bribery and Corruption Group Policy,
    - Compliance Charter,
    - Grievance Redressal Mechanism,
    - KYC and Anti-Money Laundering and Counter Terrorist Financing Policy, and
    - Sanctions Screening Policy
  - ii. Responsible Lending and Risk Management
    - Clients Debts Restructuring Policy,
    - Collections & Settlement Policy,
    - Antifraud Management Policy,
    - Underwriting Policy
    - Legal Risk Management in Terms of Operational Risk Management Framework,
    - Home Credit Operational Risk Management Framework
  - iii. Partnership Management
    - Communications Policy,
    - Outsourcing Risk Management Framework,
    - Sourcing and Procurement Policy,
    - Product & Operation Approval Process.
  - iv. Principles of Data Protection and Digital Infrastructure Security
    - IT Strategy,
    - Asset Classification and Data Protection Policy,
    - Data Governance Framework,
    - IT Architecture Governance Policy,
    - Service Asset and Configuration Management Policy,
    - IT Change Management Policy,
    - Information Security Policy.
  - v. Remuneration Related Matters
    - Remuneration Policy,
    - Variable Remuneration Principles for Top Management and Selected Managers.

## 1.5 Regulatory Context

The Policy takes into account the regulatory documents published by regulatory bodies, in particular, the provisions of the Companies Act, 2013 and rules issued thereunder, as amended from time to time.

## 1.6 Implementing Group Guidelines

The Group Guidelines, which describe in more detail selected matters stipulated by this Policy may be issued to implement certain processes and/or tools. The Group Guidelines do not form part of this Policy; however, they shall be in accordance with this Policy and shall not contradict it. The Group Guidelines shall be developed only if there is an explicit authorization stated in this Policy and approved by the Group.

The Company shall implement the Group Guidelines into their local procedures and processes unless the full implementation is not possible due to local legal and regulatory frameworks.

## 1.7 Definitions and Abbreviations

The meaning of capitalized terms and abbreviations used in this Policy is set out in Annex 1.

# 2 Main ESG Principles

This Policy provides a framework for the company to implement sustainable business practices in the context of ESG principles.

While sustainable business has always been one of the core principles of our operation, ESG principles provide a systematic framework through which the company assesses, addresses and demonstrates its orientation towards sustainable business in a more precise and holistic way. ESG Practices relate to the Company business, as well as its impact on the communities and natural environment in which the HCIN operate. The core of ESG practices at Group level is Financial Inclusion and Responsible Lending, which needs to be followed at company level.

HCIN, as a responsible lender, pays strong attention to customer rights and interests, and understands that an important part of Financial Inclusion is financial literacy. The company's goal is to foster a culture strongly grounded in business ethics, and to pro-actively embrace inclusion and diversity. In addition, the Company strives to give back to the community and create value for all stakeholders.

The company implements ESG Practices in order to mitigate risks and use opportunities connected to its operation, and to deliver a long-term value to multiple stakeholders, including customers, employees, shareholders, communities and the general public. ESG Practices also ensure that challenges and risks for the future are well-addressed. ESG Practices closely relate

to corporate ethics, diversity and inclusion, environmental aspects, sustainable governance, risk management policies, digital transformation, data protection, cybersecurity and other factors.

Sustainable Practices include activities purposed to make a constructive contribution to the well-being of society beyond the company that fall outside the bounds of immediate commercial activities and are independent of its commercial goals (hereinafter “CSR and Community Development”). This includes all initiatives regardless of whether they are primarily coordinated by the External Affairs team, HR team or any other function. As the company is an inclusive finance provider, financial literacy plays a special role in our Corporate Social Responsibility (hereinafter “CSR”) strategy.

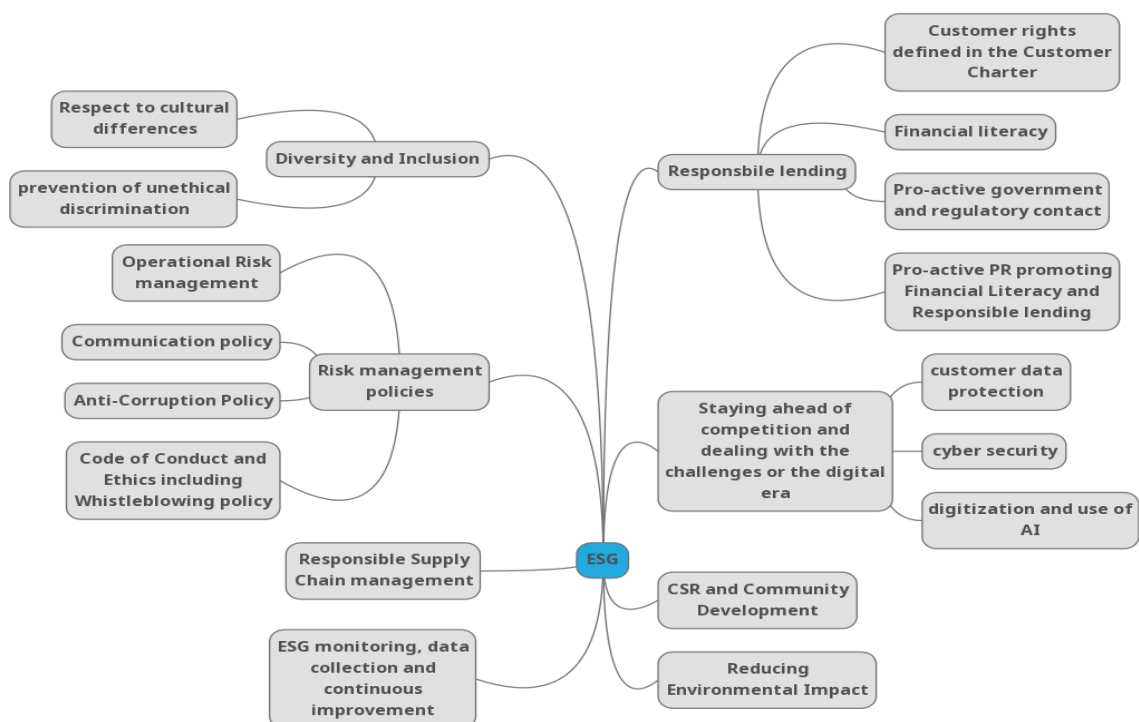
ESG Practices are justified on the basis that serving stakeholders is essential to maximising corporate value, meeting company funding and other partners’ expectations and maintaining our “license to operate” in society.

The purpose of ESG Practices is neither marketing, nor promoting of our branded products and services.

This Policy represents the first stage of implementation of ESG principles and the Group intends to further develop its ESG efforts in HCIN.

Further in line with group directives and vision, HCIN will follow and implement ESG principles.

### Matrix of the HCIN’s management of ESG principles aimed to deliver long-term positive performance:



### 3 Roles and Responsibilities

This clause describes roles and responsibilities related to implementation of ESG principles on Company levels.

#### 3.1 Company Board of Directors

The Company BoD, in particular:

- a) approves implementation of this Policy and ensures its proper implementation, and
- b) ensures the maintenance of a sound and effective introduction of ESG Practices in Company.
- c) establishes the Company ESG Working Group (hereinafter "CEWG") , and may entrust additional responsibilities to its members, and
- d) adds or removes members of the CEWG as and when and requirement basis.
- e) approves the Company ESG Annual Plan basis the recommendation of Company CEO, which is based on the Group Guidelines on ESG Practices and Reporting

#### 3.2 Company ESG Working Group (CEWG)

The CEWG, in particular:

- a) provides priorities and guidance in the area of ESG and sustainability,
- b) in line with Sustainability Practices, ensures the use of reliable, effective and efficient methods for managing ESG initiatives and ensures the establishment of a reliable and integrated framework for management of these actions, and
- c) supports Director External Affairs in preparing the Company ESG Annual Plan and its submission for approval and fulfils action steps stemming thereof.

#### 3.3 Company Director External Affairs:

The member of the Board of Directors of the Company, entrusted with responsibility of managing External Affairs of the Company shall in particular:

- a) chairs the CEWG,
- b) ensures proper and timely implementation of Group Guidelines on ESG Practices and Reporting on Company level,
- c) provides expertise in the implementation of ESG Policy,
- d) shares the CEWG meeting minutes with the GEWG. and
- e) jointly with CEWG assesses the materiality of ESG priorities and organizes data collection needed for the Group Annual ESG Report, which he provides to the GEWG.

#### 3.4 Company Chief People Officer

The Company Chief People Officer, in particular:

- a) advises on the creation of the Company ESG Annual Plan with respect to diversity and inclusion principles, equal opportunities for employees, and similar matters, and
- b) collects the data for ESG monitoring related to the Company employees as requested by the CEWG.

#### 3.5 Company Chief Marketing Officer

The Company Chief Marketing Officer, in particular:

- a) advises on the creation of the Company ESG Annual Plan and is responsible for the CSR implementation including utilisation of budget, partner associations and other community development activities
- b) Communicates about CSR at multiple touch points both externally and internally
- c) Manages internal and external communication encompassing activities related to ESG matters mentioned in this Policy likes of Financial Literacy and others.

## 4 ESG Governance Framework

Policy sets out a framework of ESG governance, the purpose of which is to duly address all ESG principles. In order to ensure that ESG initiatives are planned, managed and executed properly, ESG Working Groups are set up at Company level.

### 4.1 Company ESG Working Group (CEWG)

The CEWG shall be established by the Company Board of Directors. The CEWG should be chaired by Company Director External Affairs and in his absence/unavailability by Chief Legal Officer. In the absence of the aforesaid, the members of the CEWG shall select the chairperson for the meeting amongst the members present in such meeting.

#### 4.1.1 Composition of CEWG and Rules of Procedure

The CEWG shall comprise of:

- a) Company Director External Affairs,
- b) Company Chief Legal Officer & Director,
- c) Company Chief Financial Officer & Director
- d) Chief Marketing Officer
- e) Company Chief People Officer,
- f) Company Chief Risk Officer,
- g) Head - Treasury

Members may be added or removed as deemed appropriate by the BoD. Further, Company ESG Project Manager and Head- Public Relations shall also attend the meeting to apprise the members on the status of ESG/projects, however, shall not have the right to vote.

The CEWG shall meet at least semi-annually, and meetings shall be minuted by the CEWG Project Manager. Minutes from these meetings shall be shared with the GEWG through, or under the authority of, the Company Director External Affairs. Detailed CEWG Meeting Rules of Procedure shall be set accordingly as described in Annex 2.

#### 4.1.2 CEWG's Remit

The CEWG's remit is to:

- a) formulate the Company ESG Annual Plan, based on the Group Guidelines on ESG Practices and Reporting as well as on inputs from various local



stakeholders.

- b) appraise ideas for CSR & Community Development initiatives, according to the Group Guidelines on ESG Practices and Reporting,
- c) coordinate the cross-departmental cooperation necessary for certain ESG matters and set up mechanisms to make such cooperation smooth and with clear responsibilities.
- d) assign project managers, approve timelines and allocate the given ESG budget, especially for CSR and Community Development initiatives.
- e) assign mechanisms for collecting ESG-related data as well as stakeholders' engagement.
- f) monitor progress on each ESG initiative and flag up issues or potential issues as they arise.
- g) receive reports from respective departments on measurable impact and use them to adjust existing and future ESG initiatives.
- h) serve as the guardian, authority, source of information and point of contact for the ESG efforts, including CSR and Community Development, to management, Group Company staff and the GEWG.

## 4.2 Cooperation Across Functions

### 4.2.1 General Principles

Implementation of certain CSR projects, inclusion and diversity initiatives, Employee engagement initiatives and various other ESG Practices shall require cross-functional cooperation at all levels. Each employee and function are bound to follow and cooperate at best of capacity to achieve ESG goals set in Annual ESG plan.

### 4.2.2 Practice Suggestions

In some bolder cases this might go as far as redesigning business functions and practices to aid their chosen causes. For example, offering charity products through mobile app marketplaces; building in buttons through which users may donate funds to a selected charitable cause; etc.

Similar efforts of shared value creation and, leveraging Company's infrastructure for CSR causes are encouraged, as long as they do not interfere with the Company's business and are approved by the Company leadership. Members from involved departments should cooperate in such approved initiatives.

## 5 Inclusive Finance and Responsible Lending

HCIN provides state-of-the-art consumer finance services, ensuring that it is well-positioned for the digital era and challenges that the world is facing. The company is well digitalized with HCIN app and web and has reach to cater financial needs of underserved population. This enables company to serve a wide spectrum of customers and contribute to Financial Inclusion.

Company recognizes that Financial Inclusion comes with great responsibilities. In India, big segment of customers lacks prior experience with credit services. Company has responsibility to ensure that their needs and interests are met, and to raise their level of financial literacy, which is also support by Government of India mission of to strengthening of Financial Inclusion.

## 5.1 Customer Charter

Being a responsible lender, HCIN will make sure that customers are treated fairly and clearly understand all details about the service they are purchasing from Company and always have all necessary information about the products' terms and conditions. The basic principles of how the Company will approach its customers are presented in Customer Charter (ref Annex 5).

## 6 Staying Ahead in the Digital Age

The company will constantly adapt and innovate to stay ahead in digital age to meet the expectations of younger, digitally savvy customers, who are asking for personalized services, easy to use and quicker transactions. This means improving customer experience while also increasing security and underwriting capability through the use of various kinds of Big Data analytics, AI and other advanced data science.

Digitization also has major implications for cyber-security and customer data protection especially while sharing data with third parties via APIs. The Company embraces a zero-tolerance policy towards any customer or other internal data leakage, which is vital for maintaining trust of our customers, partners and regulators.

## 7 Financial Literacy

Financial Inclusion means not only access to credit services but also the understanding of basic principles of finance and being able to make informed financial choices. For this reason, the promotion of financial literacy is the very important for our company and we have been doing this from past as this is foundation for our corporate responsibility strategy. Financial literacy initiatives are part of CSR and Community Development, but since there is a close link between financial literacy, responsible lending and Financial Inclusion, it deserves special attention and is treated in more detail as follows:

### 7.1 Focus Areas

- a) promoting responsible lending and borrowing practices.
- b) Informing mass about what benefits and obligations stem from a credit contract to ensure customers make informed decisions.
- c) providing information about the basic principles of money management and household budgeting and spreading financial education for different demographic groups of population.

### 7.2 Basic Principles of Newly Developed Financial Literacy Initiatives

HCIN is encouraged by Group to introduce financial literacy programmes that have the following features:

- a) Efficiency

Company shall always strive to achieve that the recipients are receiving information in a way which is easily to understand, engaging and useful. It is important to take into consideration the specifics of the audience, whether customers, partners, children, parents or other groups. We shall always make sure that relevant content is delivered in an appropriate manner to a corresponding audience. Efficiency of education should be measured and continuously improved.

b) Scalability

Our goal should be to reach each large audience. Therefore, we should always try to seek forms of financial education which are scalable. While developing financial literacy projects, sufficient resources should be devoted to promotion and reaching large audiences.

c) Digital Form

Launching financial education online is becoming increasingly important. Online contents can reach people even in remote areas where it is usually most needed. Most importantly, digital content is easily scalable. In some cases, offline activities are more appropriate, for example when direct contact with the recipient is necessary for the specific type of financial education or in communities which lack internet connectivity. Making financial literacy digital shall therefore not be a limitation but rather a general intent. Online contents should be also published in local and regional languages.

d) Modern Methods

While developing new content, it is important to refer to current best practice of financial literacy training and the latest research findings. This refers not only to content and methods, but also forms of education. It is advisable that Companies reach out to governmental or non-governmental organizations or experts for guidance.

### 7.3 Financial Literacy towards Customers

Aside from various financial literacy projects for communities, it is important to deliver financial literacy contents our customers. Besides making financial literacy content available, we must notify customers about such content and motivate them to participate in financial education and make exposure to financial education a part of the standard customer journey.

### 7.4 Financial Literacy and the Company Business

Financial education is done as an expression of corporate social responsibility. While financial literacy may be provided in different forms, for instance as part of a loan application, it remains independent of the sales process and these two should not be made contingent upon one another.

### 7.5 Localized Implementation

Marketing & Customer Experience Function is responsible for providing financial education. We should conduct Financial Literacy activities according to local circumstances and with respect to cultural specifics.

## 8 CSR and Community Development

CSR and Community Development are activities purposed to make a constructive contribution to the well-being of society beyond commercial activities and independent of its commercial goals. This includes all initiatives regardless to whether they are primarily coordinated by the Company's External Affairs Department, Company's HR department or any other function. As the Group advocates for Financial Inclusion and responsible lending, financial literacy plays a special role in the CSR strategy of the company.

In order to enhance the efficiency, communication and application of best practices, CSR activities should apply the CSR and Community Development Principles stated in Annex 3.

## 9 Diversity and Inclusion

The priority of company should be to create a work environment, where all employees are treated with dignity and respect to individual differences. Company is against all forms of discrimination based on age, nationality, ethnic origin, sexual orientation, gender identity or expression, religion, marital status or disability, as well as against any other form of unfair or unlawful discrimination. The Company fully supports a culture of diversity and inclusion.

The culture is based on respect to employees, customers as well as communities. Operating across country like India with very diverse cultures, attention and respect for cultural and other differences is one of the keys to our success.

Diversity and Inclusion principles are governed by Annex 4.

## 10 Risk-Based Approach

Risk management is one of the core purposes of ESG Practices described by this Policy and is also at the core of the company. In order to manage and mitigate possible risks connected with ESG Practices, a risk-based approach shall be applied. The purpose of the risk-based approach is to ensure that appropriate, proportionate, and adequate measures are taken to mitigate identified risks. Beside areas described by the Policy, the principles of risk management in individual areas are outlined in further detail in other risk-related policies. HCIN should also integrate environmental risk in our internal risk management analysis which impacts business continuity.

## 11 Lawful and Ethical Business Operation

HCIN holds itself to high standards of integrity and compliance when carrying out business in India. Business ethics and integrity are part of company corporate culture and play an irreplaceable role in the business activities.

#### 11.1 Anti-Bribery and Corruption, Anti-Fraud and Compliance Policies

HCIN is fully licensed entity regulated by Reserve Bank of India, holding compliance with laws and regulations, prevention of bribery, money-laundering, fraud or any other illicit activities as their highest priority. The Company strives to build a working environment where company employees feels comfortable reporting incidents. This strengthens the transparency and overall compliance culture.

#### 11.2 Business Ethics

sustainability of Company's business is conditioned by making sure that our activities are managed in accordance with the principles set out in Code of Business Conduct and Ethics which ensures that all employees should be ethically compliant and act with integrity. Part of the Code is the whistleblowing policy, which encourages Company employees to report any suspected wrongdoing and sets out mechanisms for appropriate treatment of such incidents as well as for the protection of a whistle-blower.

### 12 Fair Treatment of Employees

Respecting the rights of employees is an area in which there is no room for compromise. The Company protect their employee's rights as defined below. Company will also protection the below-stated rights and principles for all partners and suppliers.

#### 12.1 Child Labour Avoidance

Company employs only employee who meet the applicable legal minimum age requirement and they comply with all other applicable local labour laws.

#### 12.2 Prohibition of Forced Labour

Company avoid any form of forced labour. All company employees work voluntarily, and are free to terminate their employment, subject to local labour laws and contract. Company may not violate their human rights including the right to freedom of movement.

#### 12.3 Freedom of Association

Company allow employees to freely associate with others and provide a mechanism for open communication between management and employees.

#### 12.4 Non-discrimination

Company do not allow any form of discrimination of their employees based on race, sexual orientation, gender identity, colour, age, ethnicity or any other characteristic protected by law. Company has no tolerance for any form of workplace harassment, abuse or biased treatment.

#### 12.5 Safe and Healthy Working Environment

Company provide a safe, hygienic and healthy working environment, and identify, evaluate, and control employee exposure to health and safety hazards.

### 13 Sustainable Supply Chain and Partnership Management

The Company give great attention on application of high legal, ethical, environmental and labour standards within our business activities and among our suppliers and partners.

More details on guidance for maintaining a sustainable supply chain can be found in the Group Sourcing and Procurement Policy.

## 14 Environmental Protection

Company is fully aware of its environmental responsibility and complies with all applicable laws and regulations related to environmental protection.

The Company recognizes that climate change is occurring, and acknowledges the scientific consensus, led by the Intergovernmental Panel on Climate Change, that greenhouse gases emitted by human activities are the primary driver. We recognize the benefits of helping to reduce greenhouse gas emissions as climate change poses significant risks to the global economy.

### 14.1 General Principles

The company aims to avoid, or where unavoidable, minimise or mitigate, air emissions, water, energy and raw materials usage, and to safely treat, store, transport, use and discharge or dispose of waste, subject to local specifics and law.

### 14.2 Energy

Company's goal is to use reasonable efforts (taking into account that the company is active in the consumer finance) to reduce energy consumption and improving efficiency. Our aim is to manage and reduce HCIN's impact on the climate through optimizing its internal operations in its services and products.

### 14.3 Paperless Operation

Company should aim for paperless operation, mainly through digitization.

### 14.4 Further Initiatives

Company will come up with further initiatives for environmental protection, such as facilitating electronic waste collection for further use or recycling in cooperation with partners or motivating employees to volunteer in green activities, etc.

## 15 ESG Communication, Monitoring and Reporting

The Group Guidelines on ESG Practices and Reporting and Company ESG Annual Plan serve mainly internal needs of implementing of ESG principles in HCIN.

The Group ESG Annual Report serves as a core tool for communication of the company with the external world about the outcomes and plans of its ESG Practice.

### 15.1 External and Internal Communication

External and internal communication is one of the most vital parts of the ESG Practices. For funding and other business partners, customers, company employee and society more broadly.

### 15.2 Guidelines on ESG Practices and Reporting

The Group Guidelines on ESG Practices and Reporting provide guidance on the framework of the Company ESG Annual Plans, further details on reporting matters and methodology for collecting and presenting the data.

Also, the document sets a general framework for qualitative and quantitative indicators specified by the CEWG and indicates which ESG matters shall be continuously monitored

by Companies' respective departments, for the purpose of both, monitoring of the ESG Practices implementation as well as external communication.

Guidelines on ESG Practices and Reporting is a core ESG document issued on an annual basis by the Group and implemented through Companies' ESG Annual Plans. HCIN will follow and implement the guidelines issued by Group through the Annual ESG plan.

### 15.3 Group Annual ESG Report

The Group Chief External Affairs Officer leads the process of preparing the Group Annual ESG Report by the External Affairs Department. Competent departments of HCIN supply data and inputs necessary for preparing the Group Annual ESG Report.

The Group Annual ESG Report includes data from all Group Companies including HCIN as specified in the Group Guidelines on ESG Practices or additionally requested by any GEWG member from respective Group departments.

### 15.4 Company ESG Annual Plans

HCIN ESG Annual Plan is the implementation of the Group Guidelines on ESG Practices and Reporting. Director External Affairs will be guiding and overseeing Company's ESG planning. ESG Annual Plan would be prepared and approved by Director External Affairs and CEO.

HCIN department heads shall consult their proposed ESG initiatives with the respective department at the Group level before Company ESG Annual Plan is submitted to the Company CEO for their final approval.

Once HCIN ESG Annual Plan is approved, the BoD becomes accountable for overseeing its implementation while the Director External Affairs lead the implementation efforts, supported by other functional heads. HCIN External Affairs Department through Director External Affairs shall furnish details to the Group External Affairs Department with Company ESG Annual Plans within the deadlines set by the Group Guidelines on ESG Practices and Reporting.

The Company ESG Annual Plan shall contain:

- a) ESG targets decided by CEWG, including reasoning behind such choices,
- b) the Company employee's initiatives which will receive Company support;
- c) Company employee engagement plan including Company internal communication department support,
- d) cross-departmental initiatives,
- e) resources allocated to each cause including, if applicable, the value-equivalent of working days waived for employee voluntary assignments with prior approval of respective supervisor.
- f) desired results or achievable targets, and
- g) implementation timeline specific to each initiative.



As part of ensuring that ESG is managed effectively within the Company, simple implementation tracking is needed to ensure that initiatives stay on time and within budget, with adjustments (if required) and also analyses of causes in case they do not.

The GEWG reserves the right to dissociate the Companies from any cause or organisation that is deemed inappropriate and/or contrary to Group values or this Policy, and to recommend that Companies terminate their cooperation with such causes or organisations. HCIN ESG Annual Plans shall be documented and archived by the Group External Affairs Department.

## 16 Local Implementation

### 16.1 Local Implementation of the Policy

HCIN to implement this Policy into the local policies/guidelines by the HCIN's BoD approval. The Company is obliged to follow the full scope of application of this Policy unless there is an exception in accordance with clause 16.3 of this Policy.

### 16.2 Local Implementation of the Group Guidelines

HCIN to implement the Group Guidelines into the local guidelines by the Company's Director External Affairs or relevant responsible person determined by the Group Chief External Affairs Officer and Company CEO. The Company is obliged to follow the full scope of application of the Group Guidelines unless there is an exception in accordance with clause 16.3 of this Policy.

### 16.3 Exceptions

The Company Director External Affairs or relevant responsible person determined by the Group Chief External Affairs Officer has the right to ask for exceptions from this Policy or the Group Guidelines only if this exception is necessary to meet the local regulatory requirements or would bring considerable process improvement.

In case of contradiction with the local legal requirements the Group Chief Legal & Compliance Officer and HCIN CEO or relevant HCIN representative shall be informed about any request for exception/changes related to this Policy/Group Guidelines before its approval.

The Group Chief External Affairs Officer is the final authority for approving any exceptions related to this Policy or the Group Guidelines. However, in case of contradiction with local laws and regulations, this may only happen after confirmation by the Group CLCO.

All exceptions allowed according to this Policy shall be documented by Group External Affairs Department and must be available upon request.



## 17 Final Provisions

### 17.1 Assumption

This Policy applies only if it does not contradict local legislation. If implementation of some rules and principles under this Policy is not possible due to local legislation, HCIN Director External Affairs shall contact the Group Chief Legal & Compliance Officer and the Group Chief External Affairs Officer under the exception process according to clause 16.3 of this Policy.

### 17.2 Owner of the Policy

The responsible department/function of this Policy is the HCIN - Legal & Governance.

### 17.3 Implementation

This Policy has been effective with immediate effect.

## Annex 1 – Definitions of Terms and Abbreviations

In this Policy:

**"API"** means application programming interface, which is a software intermediary enabling interaction between multiple applications and obtaining their data from one another.

**"BoD"** means board of directors.

**"CCO"** means Chief Compliance Officer.

**"CEO"** means Chief Executive Officer.

**"CEWG"** means Company ESG Working Group as described in clause 4.2 of this Policy.

**"CLCO"** means Chief Legal & Compliance Officer.

**"Company ESG Annual Plan"** means report as defined in clause 15.4 of this Policy.

**"CSR"** means Corporate Social Responsibility.

**"CSR and Community Development"** means activities purposed to make a constructive contribution to the wellbeing of society beyond the Group's immediate commercial activities and independent of its commercial goals.

**"CSR Project Officer"** means person responsible for CSR project management on the Company level.

**"D&I"** means diversity and inclusion.

**"ESG"** means environmental, social and governance principles of sustainable business operation. The ESG framework is a universally recognized framework through which the Group assesses, addresses and demonstrates its orientation towards sustainable business in a more precise and holistic way.

**"ESG Practices"** or **"Sustainable Practices"** means practices as defined in clause 2 of this Policy.

**"ESG Working Group"** or **"EWG"** means ESG Working Group as described in clause 4 of this Policy.

**"Financial Inclusion"** is defined as (a) providing accessible financial services to those who tend to be excluded from the regulated market or (b) spreading financial literacy among people who lack such knowledge, in order to help them make financially healthier decisions.

**"GR"** means government relations.

**"GEWG"** means Group ESG Working Group.

**"Group Annual ESG Report"** means a report

**"HCIN"** means Home Credit India

**"Policy"** means this Group Policy on ESG Sustainability PolicyPolicy on ESG Sustainability.

**"PR"** means public relations.

**"Responsible Lending"** is defined as (a) lending money only to people who are able to repay the loan without stress and (b) making sure that customer's rights are protected before, during and after providing the loan to the customer.

**"Sustainable Practices"** means practices as defined in clause 2 of this Policy.

## Annex 2 – Meeting Rules of Procedure of Company ESG Working Group

### 1 In General

The CEWG is established by BoD and chaired by the Director entrusted with responsibility of managing external affairs of the Company. In case he/she is not present, the CEWG meeting is chaired by Chief Legal Officer. In the absence of the aforesaid, the members of the CEWG shall select the chairperson for the meeting amongst the members present in such meeting.

CEWG should meet at least on semi-annual basis, and meetings should be minuted by CEWG Project Manager. ESG Project Manager is a Company External Affairs Department employee. CEWG Project Manager is responsible for organization of CEWG meetings and related administration. CEWG meeting is called by the CEWG chairman or in his/her absence by the CEWG vice chairman.

#### 1.1 CEWG Composition

The CEWG should comprise of:

- a) Company Director External Affairs,
- b) Company Chief Legal Officer & Director,
- c) Company Chief Financial Officer & Director,
- d) Company Chief People Officer,
- e) Company Chief Risk Officer,
- f) Company Chief Marketing Officer.
- g) Head - Treasury

Further, Company ESG Project Manager and Head-Public Relations shall also attend the meeting to apprise the members on the status of ESG/ projects, however, shall not have the right to vote.

Members may be added or removed if deemed appropriate by the BoD. Any of the CEWG members can invite for a CEWG meeting a host participant, for a part of or for the whole meeting. This host participant does not have a voting right.

In case member of the CEWG cannot attend the CEWG meeting then he/she can appoint his/her deputy to act on his/her behalf by means of written statement (e.g. email) which shall be documented as part of meeting minutes prepared by a CEWG Project Manager. Deputy takes over the voting right of appointing CEWG member.

#### 1.2 Agenda

Any member of senior management can submit an agenda proposal to CEWG. Proposal of an agenda point shall include the following information and shall be handed over to CEWG ESG Project Manager in timely manner:

- a) topic to be discussed,
- b) required decision (e.g. acknowledgment, approval),

- c) presenter, and
- d) estimated time for discussion.

CEWG meeting agenda shall be approved in advance by the chairman or in his/her absence by the CEWG vice chairman.

CEWG ESG Project Manager shall distribute agenda and materials needed for the assessment to CEWG members at least 3 working days in advance before CEWG meeting.

### 1.3 Quorum

The quorum for the meeting of the Committee shall be one-third of total strength of the Committee or two Members, whichever is higher. The quorum shall be present not only at the time of commencement of the meeting but also while transacting business. However, either chairman or vice chairman of CEWG has to be present themselves.

Members of CEWG may participate in a meeting of CEWG from separate locations by means of teleconference or other communication equipment which allows those participating to hear each other and shall be entitled to vote or be counted in the quorum accordingly.

### 1.4 Decisions

CEWG shall reach decisions by a simple majority of those voting on the issue in question. If the numbers of votes for and against a certain proposal are equal, the chairman of CEWG (or in his/her absence the vice chairman of CEWG) has a casting vote.

### 1.5 Meeting Minutes

CEWG meetings are recorded in a meeting minutes document by CEWG Project Manager. A draft of the meeting minutes shall include the following information:

- a) order number of CEWG meeting in given year,
- b) place of holding CEWG meeting,
- c) date of holding CEWG meeting,
- d) attendees of CEWG meeting including deputies and hosts and information about their personal attendance or by means of a remote access,
- e) agenda of CEWG meeting,
- f) deputy appointments (e.g. via email),
- g) agenda points including presenter, required decision, issue description, minutes from discussion, vote decision of each CEWG member or his/her deputy, final CEWG voting result, and
- h) list of open points and their status.

Draft of meeting minutes is circulated to CEWG members and relevant employees (presenters, owners of open points) by CEWG Project Manager within 10 working days after CEWG meeting for comments. Final meeting minutes are approved at the following regular CEWG meeting.

All meeting minutes shall be stored electronically. CEWG ESG Project Manager archives meeting minutes together with agenda and all materials needed for the assessment (including deputy appointments) on the shared folder with controlled access at least for 5 years following CEWG meeting.

## 2 Per Rollam Meeting

### 2.1 Calling of Per Rollam CEWG Meeting

CEWG can adopt a decision per rollam by e-mail. Per rollam CEWG meeting is called by the chairman of CEWG or in his/her absence by the vice chairman of CEWG.

### 2.2 Agenda

Agenda for per rollam CEWG meeting is agreed in advance with and approved by the chairman of CEWG or in his/her absence by the vice chairman of CEWG. A point on the agenda for per rollam CEWG meeting can be proposed by any member of Company senior management. CEWG Project Manager shall be informed about such a topic before preparing a proposal of the agenda for per rollam CEWG meeting. Proposal of the agenda point including materials needed for the assessment should be submitted to CEWG ESG Project Manager in following structure:

- a) topic to be discussed,
- b) required decision (e.g. acknowledgment, approval),
- c) presenter,
- d) material needed for the assessment,
- e) proposed decision, and
- f) indication of the time limit within which CEWG members should vote.

The time period for voting may not be less than 2 working days.

All documents for per rollam CEWG meeting are distributed by CEWG Project Manager to members of CEWG.

### 2.3 Quorum

The necessary quorum for per rollam decision-making is all members of CEWG.

### 2.4 Decisions

The validity of the vote by email shall require the expression of the member of CEWG containing full text of the decision and indicating date, month and year of the date on which it was made.

When voting per rollam, the decision is taken if an absolute majority of all members of CEWG votes for its adoption.

### 2.5 Meeting Minutes

Per rollam CEWG meetings are recorded in meeting minutes by CEWG Project Manager. A draft of the meeting minutes shall include the following information:

- a) order number of CEWG meeting in given year,
- b) time period for voting of per rollam CEWG meeting,
- c) attendees of per rollam CEWG meeting including deputies,
- d) agenda of per rollam CEWG meeting,
- e) agenda points including presenter, required decision, issue description, vote decision of each CEWG member, final CEWG voting result, and
- f) emails with votes of members of CEWG.

Draft of meeting minutes is circulated to CEWG members and relevant employees (presenters, owners of open points) by CEWG Project Manager within 10 working day after per rollam CEWG meeting for comments. Final per rollam meeting minutes are approved at the following regular CEWG meeting. All meeting minutes shall be stored electronically. CEWG Project Manager archives meeting minutes together with agenda and all materials needed for the assessment on the shared folder with controlled saccess at least for 5 years following the CEWG meeting.

## Annex 3 – CSR and Community Development Principles

### 1 Scope

CSR and Community Development, or activities purposed to make a constructive contribution to the wellbeing of society beyond the company immediate commercial activities and independent of its commercial goals. This includes all initiatives regardless to whether they are primarily coordinated by the Company External Affairs team, Company HR team or any other function. As an advocacy of Financial Inclusion and Responsible Lending, financial literacy plays a special role in its CSR strategy.

In order to enhance the efficiency, communication and application of best practices, CSR activities across should apply the below-stated CSR and Community Development Principles.

### 2 Planning of CSR and Community Development Activities

#### 2.1 Choice of Themes

HCIN shall develop their CSR projects based on their own decision and in accordance with their local conditions and cultural specifics. The themes of their CSR activities should be guided by the following principles:

- CSR activities should be guided by Company values and beliefs both in terms of choice of areas and in the way these initiatives are executed.
- Group's core tenets are promotion of financial and social inclusion, Responsible Lending, people empowerment or fulfilment individual's aspirations. The choice of core themes should be related to these Company values. One of the fields where the Company can use many of its strengths for the benefit of the society is financial literacy. Besides, education in general, poverty reduction or healthcare are some of the fields where our initiatives have been held and which are connected to our values.
- The choice does not have to be limited to the above areas. In some cases, the choice of area shall be led by the local government priorities. It is within HCIN' own discretion to choose the areas where they can best contribute to the community and to address topics prioritized by the local government policies.

#### 2.2 Creation of Shared Value

Throughout the world corporate community, there is a recognition, that traditional CSR shall be transformed from mere incidental corporate donations and one-time events into a more systematic efforts, using innovative methods and utilizing various Companies' resources to create a lasting shared value, and integrating Companies closer into the community.

To give a few examples, such kind of community development practices may include knowledge-sharing to support small businesses, promoting entrepreneurship in communities, funding research into financial inclusion, spreading financial and digital

literacy through our customer app, helping affected regions to sell local produce through our marketplace, raising money among or with the help of our employees or supporting employee volunteering.

## 2.3 Stakeholders Engagement

Multiple stakeholders should participate in planning, execution and evaluation of CSR and Community Development projects: Company managers, Employees, customers, partners, direct beneficiaries or other members of communities.

A successful CSR and Community Development programme is one that to a great extent correlates with what these stakeholders agree are meaningful causes.

## 2.4 Employee Engagement and Volunteering

Employee engagement, in particular, is an important way of fostering solidarity and sustainable values among the company employee. For this reason, it should be encouraged by all means.

HCIN employees will be allowed and asked for their contribution and professional skills or their time to CSR and Community Development initiatives. To enable this, HCIN would choose to release a certain number of working hours per month or year from normal business assignments so that they can dedicate this time for working on an approved Community Development activity either within the Company or as volunteers for a partner organization.

Other forms of employee engagement may include rewards for employees for bringing ideas for new projects, putting up prospective initiatives to employee vote, matching employee donations, or support engagement in any other way.

## 2.5 Efficiency and Systematic Approach

Management teams should make the best use of the Company resources in order to achieve maximum effect of their projects, maximizing scope and benefit to beneficiaries. This refers not only to funds allocated for these activities but also to manage resources or other use of Company infrastructure.

In order to achieve a substantial impact to the communities, respective teams should focus their efforts in a systematic way, gradually developing best practice and making innovations. The overall number of core themes should be limited to one or several focus areas so that resource allocation is not overstretched, and the efforts scattered and ineffective.

## 2.6 Policy Framework on CSR



The CSR activities shall be undertaken by the Company, as stated in this Policy, as projects or programs or activities excluding activities undertaken in pursuance of its normal course of business.

The CSR activities which are exclusively for the benefit of employees of the Company or their family members shall not be considered as CSR activity.

The Company shall give preference to the local area or areas around its administrative offices/ training centers for spending the amount earmarked for CSR activities.

Contribution to any political party of any amount directly or indirectly shall not be considered as CSR activity.

CSR is neither marketing, nor promoting of our products and services.

The Board of Directors of the Company may, from time to time, decide to undertake its CSR activities as recommended by the CEWG Committee, through a registered trust or a registered society or company established under Section 8 of the Companies Act 2013, pursuant to Section 135 of the Companies Act, 2013 and rules made thereunder.

### 3 Implementation of CSR and Community Development Projects

#### 3.1 Monitoring and Reporting

In order to ensure high efficiency and communication about CSR projects, responsible departments shall be guided by the following principles while executing their CSR projects:

- a) In order to achieve continuity, measure the results, and constantly improve the best practices, all activities shall be documented, including initial intentions and reasoning, execution plan, progress and final evaluation.
- b) This includes visual documentation such as pictures, photos and videos, as well as testimonials and opinions of third parties.
- c) All of these materials and data shall be collected at one place within the Company External Affairs department, including records of activities coordinated primarily by other departments.
- d) Every CSR initiative shall be evaluated, in terms of results achieved, resources used, lessons learned, strengths and shortfalls of a particular project, efficiency and professionalism of partners etc. Recommendations about both the character and execution of CSR projects, should be the culmination of every final activity report. The impact of CSR initiatives shall be reported and tracked at least on semi-annual basis.
- e) Progress of CSR activities should be reported to the External Affairs Department on regular basis.
- f) The Board in its report shall include the details of the CSR activities undertaken in the Financial Year (if any). The CEWG Committee shall provide a responsibility statement on the implementation and monitoring of the CSR Policy and that it is in compliance with CSR objectives of the Company.

- g) The CEWG Committee will prepare the Annual Report of the CSR activities stating clearly the resultant social impact and the gaps in implementation of the planned CSR activities will also be reported with necessary corrective actions.

### 3.2 Sharing of Best Practices

While Companies should develop their own financial literacy initiatives, they should refer to the best practice and materials developed by other teams, as well as share theirs with others.

### 3.3 Reliable and Reputable Third-party Association

In executing CSR and Community Development initiatives, if HCIN choose to cooperate with the third parties like agencies, charities or other parties. It should be guided by the following principles:

- although in some circumstances, cooperation with external parties may be the best solution, whenever feasible, the Companies should prefer to proceed with a direct relationship to ultimate beneficiaries.
- a suitable partner for the Company to collaborate on CSR activities is one which complies with the highest ethical, reputational and operational standards and is legally registered in India ; Companies are encouraged to judge the credibility and transparency of charities, agencies or foundations by referring to their track record and/or third-party references that document at least three consecutive years of service in a given market.
- while cooperating with third parties, HCIN should mitigate risks involved, at least reputational and operational risks.
- in case the beneficiaries are individuals, the preferred way to provide financial or material support is through personal handover. If Companies provide financial support through partners, they should ensure the beneficiaries receive the support in full and within an agreed timeframe.
- It is important to seek advice from local company supervisory bodies or External Affairs Department before engaging with any charity, agency or foundation. If HCIN intend to provide emergency relief in a country, they should direct it through official channels run by local or national authorities.

### 3.4 Compliance with Laws and Regulations

As there are laws in India that requires HCIN to apportion part of our revenues /profitability towards CSR or, more generally, to engage in CSR activities, the HCIN should apply the principles of this Policy to those activities.

Charitable donations are also subject to Home Credit Group Anti-Bribery and Corruption Policy as well as other relevant Company policies.

#### 4 Reach of Communication

While CSR and Community Development activities are not primarily meant to promote the HCIN brand, it is important that its values are promoted, and that Employees, partners and customers are aware of such activities and of the ways they can contribute.

The communication of CSR and Community development activities is part of external and internal communication and is subject to the Group Communications Policy.

#### 5 Activities Which Are Not Covered Under CSR

Following activities shall not be considered as CSR Activities:

- a. Activities which are not mentioned under Schedule VII.
- b. Activities which are only for the benefit of employees of the Company and their families.
- c. Activities undertaken in pursuance of normal course of business of the Company.
- d. CSR activities conducted outside India.

#### 6 Budget Allocation

The corpus for the purpose of carrying on the CSR activities would include the followings:

- a) 2% of the average Net Profit, or such percentage as provided under applicable law time to time, made by the Company during immediately preceding three Financial Years.
- b) any income arising there from.
- c) surplus arising out of funds to be spent statutorily for CSR activities will not be part of business profit of the company.

In case Company fails to spend such amount, the Board shall specify the reasons for not spending the amount in the Board report.

CSR Expenditure shall mean all expenditure incurred in respect of specific projects/programs relating to the approved CSR activities. CSR Expenditure shall not include expenditure on an item not in conformity or not in line with activities which fall within the purview of the CSR activities listed in Schedule VII. Further, CSR Expenditure shall not include Projects or programs or activities undertaken outside India.

## Annex 4 – Company Diversity and Inclusion Principles

### 1 Basic Principles

HCIN should be guided by the following basic principles in relation to employees:

- a) Respect the legislation, regulatory requirements and cultural context of the country,
- b) Diversity and inclusion (hereinafter “D&I”) indicators should be monitored so that HCIN can use data-based approach and design programs that will be tailored to its needs,
- c) Create clear processes that will help HCIN minimise the influence of unconscious bias in different HR processes (recruiting, performance management, development opportunities, rewarding etc.),
- d) The D&I practice should be based on the principles of continuous improvement, working with feedback from different Companies and their employees and using best practices & following new trends in the field,
- e) HCIN is encouraged to introduce D&I measures based on the country-specific situation and needs but based on the broad principles outlined by this Policy.

### 2 Inclusive Recruiting

HCIN should be guided by the following principles to ensure D&I at workforce. When considering implementation of the below stated principles, HCIN should take into account local cultural specifics and market standards.

- a) Companies should deploy reasonable efforts to prevent bias during the recruiting process, such as replacing names of candidates with codes at the first stages of recruitment to minimise the risk of bias (CV screening, test results...), write job postings in a gender-neutral language.
- b) If possible under the local language, HCIN should word job postings and job descriptions are in a gender-neutral language, for example, by analysing them with tools like Gender Decoder or Textio.
- c) Standardise recruiting process, create clear job descriptions and candidates score cards, use Competencies Based Interview method and include tests or other objective methods (job simulations, examples of work,...) to support the decision process to ensure that we choose people based on the candidate’s competences and not unconscious bias.
- d) Try to attract diverse talents by placing job postings on specialised portals like Women in IT groups, Women leaders groups, etc.
- e) Promote HCIN as an inclusive employer and include in job postings a general statement that the HCIN supports diversity. For instance, applications from women and minority candidates are strongly encouraged. All qualified applicants will receive consideration for employment without regard to race, colour, religion, sex, national origin, disability status, gender identity, sexual orientation or any other characteristics protected by law.
- f) Mark our job offers as suitable for people with a disability, at parental leave, etc. when relevant.

### 3 Training

HCIN should consider deployment of the following measures to ensure that D&I principles become ingrained in the Company culture:

#### 3.1 Training by HR department to recruiters, particularly:

- b) Unconscious bias in HR processes training.
- c) Specifications of employing people with disabilities (to confront the stereotypes and reduce the fear of unknown).

#### 3.2 Training HR department to managers, particularly:

- i. Unconscious bias training (for recruiting, performance review, communication with people who report to them etc.).
- ii. Prevention of discriminatory behaviours.
- iii. Cultural diversity management (especially for expats).

#### 3.3 Training by HR department to all staff, particularly:

- i. Unconscious bias training for everyday communication (included in onboarding).
- ii. Prevention of discriminatory behaviours (included in onboarding).
- iii. Interactive workshops and awareness events on diversity-related topics (for example at International Day for the Elimination of Racial Discrimination).

#### 3.4 Training by HR department to communications teams, particularly:

- i. Bias-free communication training to ensure that the company doesn't support the bias through its communication (internal and external) by using specific language, pictures, etc.

#### 3.5 Training by HR department to customer care teams, particularly:

- i. Training focusing on support of customers with special needs (for example by making sure that our application and website are suitable for reading devices of visually impaired customers);
- ii. Training about how to avoid unconscious bias while communicating with customers.

### 4 Promotion of More Inclusive and Diverse Work Environment

HCIN should strive to constantly nurture diversity and inclusion among employees. In adoption of such programmes, Companies should be guided primarily by their own discretion, local cultural specifics, local market standards and local law. Below are several recommended measures for HCIN to consider:

#### 4.1 Family-Friendly Work Environment

Companies are encouraged to consider introduction of the following measures to enhance family-friendly work environment:

- i. Support fathers who decide to take parental leave.
- ii. Improve remote and flexible work options including job sharing, temporary part-time work, etc.
- iii. Keep-in-touch programme for parents on parental leave (they keep access to the system, are invited to events, have access to training and career development, etc.).
- iv. Create a parent-friendly office/meeting room with toys where parents can have their children while working, in case they didn't find a babysitter.
- v. Subsidized childcare benefit.
- vi. Paid day off for staff to accompany their kids during their first day of school.

vii. Family-oriented events such as Family Days, etc.

#### 4.2 Staff with disability

HCIN is encouraged to consider the following measures to enhance inclusion of people with disabilities:

- i. Conduct accessibility audit to check if our facilities are accessible for employees with disability.
- ii. Partner with NGOs focusing on employability of people with disability which can help us with recruiting, onboarding and educating HR people and managers.

#### 4.3 Smart Hire project

HCIN is encouraged to consider monitor the following indicators to improve the Smart Hire project to include diversity aspect:

- i. Pass-Through Rate during the whole recruiting process to see at which stage of the process may be the problem.
- ii. Source Effectiveness (Source Quality) to see which sources help us to attract more diverse candidates.
- iii. Early Attrition to analyze the reasons for attrition within first 180 days.
- iv. Candidate Experience to see if the ratings are different for specific groups.
- v. Hiring Manager Satisfaction.

#### 4.4 Further relevant indicators

HCIN is encouraged to consider monitoring of the following further indicators to enhance the D&I at workforce by:

- i. monitoring how many parents returned and stayed over 1 year in the Company after the parental leave and if they returned at the same/higher/lower position.
- ii. monitoring how many people are using the option of flexible work settings like job sharing, home office, part-time work. How many people requested and how many were granted this option (when relevant).
- iii. measuring if higher positions are sourced from inside or externally reflecting the diversity aspect (if for example women or minorities don't fall behind);
- iv. measuring the average time to get promoted, including the diversity aspect.
- v. monitoring if the person promoted from the team is the one with the long-term high performance.
- vi. measuring Gender pay gap and bonus pay gap based at rank and function.
- vii. including diversity aspect in the engagement survey.
- viii. monitoring loyalty data with diversity aspect.
- ix. comparing the termination rate for termination after 90 days (most likely incorrectly hired), after one year (most likely incorrectly embraced) and period longer than one year including the diversity aspect.
- x. monitoring the proportion of innovations proposed vs innovations implemented with diversity aspects.
- xi. monitoring the number of days of parental leave taken by men and women.

## 5 Initiatives Targeting Employees

HCIN may further introduce the below measures to promote their staff D&I culture:

- a) Collect and share inspirational stories from employees (for example women leaders, female employees succeeding in stereotypically male jobs (and vice versa), staff with disability...).

- b) Provide space for diversity management topics through workshops for employees by introducing best practices from other Companies, inviting inspirational speakers, etc.
- c) Create a mentoring program for well-performing talents, provide space for peer learning and sharing, provide extra learning and self-development opportunities (for example personal brand building workshop, etc.).

## Annex 5 – Customer Customer Charter

### Company Customer Charter

Being a responsible lender means prioritizing the needs of our customers. HCIN will make sure that the customers are treated fairly and clearly understand all details about the service they are taking with Company and always have all necessary information about the terms and conditions. Below are the basic principles of how to treat customers in this regard:

1. Act fairly and responsibly in all Company dealings with the customer.
2. Tell the customer how the loan works and the total cost of the loan before the customer applies.
3. Help the customer to understand the customer commitment.
4. Always check whether the loan is suitable for the customer taking account of the customer's circumstances.
5. Not pressurize the customer to enter into any loan agreement or to extend the term of the customer's existing loan agreement.
6. Explain in general terms what types of information Company will consider in making the lending decision, if the customer asks Company to.
7. Provide the customer with information detailing the exact terms of any loan offer Company makes to the customer.
8. Explain how Company will communicate with the customer during the term of the loan, how payments will be made and how the customer can contact Company by phone, email or online.
9. Always notify the customer by email, text, letter or phone at least 3 days before attempting to recover payment. This notice will ask the customer to contact Company if the customer is in financial difficult and cannot repay.
10. If the customer is having problems in repaying their loan, Company will deal with cases of financial difficulty sympathetically and positively and will help the customer manage what the customer owes.
11. If the customer is dissatisfied, Company will listen and try to make things right, Company will:
  - a) make it easy for the customer to contact the Company,
  - b) listen to the customer's feedback and act to it, and
  - c) help the customer.