



# Political Donations Policy

<b>Associated risk category:</b>	Future Legal & Regulatory Change and Reputation
<b>Policy owner:</b>	Corporate Affairs Director
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## Contents

1. Introduction.....	3
2. Policy Purpose.....	3
3. Policy Scope.....	3
4. Definitions.....	3
5. Policy Requirements .....	3
6. Lobbying.....	4
7. Roles and Responsibilities .....	4
8. Policy governance .....	4
9. Related Policies.....	4



## 1. Introduction

The Group is a politically neutral organisation and does not maintain political affiliations or make political donations. The Group does however engage with governments, regulators, industry organisations and other bodies for the purpose of informing them of our position on issues which affect our customers and staff.

This engagement can take many forms. For example, seeking to improve the business and economic environment, create new markets and opportunities and improve, modify or even prevent legislation. These are positive engagements which can result in well-designed laws and regulations which deliver on their intended purpose and while fostering economic and social environments for society to prosper. The Group also engages with stakeholders or through memberships of trade bodies. These memberships further aid us to constructively contribute to relevant policy and regulatory debates.

The Group also acknowledges that such engagement, despite the strong business case for them, can bring legal and reputational risks.

## 2. Policy Purpose

This policy sets out the Group's position in relation to political donations and responsible lobbying to ensure that the associated risks are managed appropriately while enforcing the Group's high standards of neutrality (the Group is politically neutral) and transparency (the Group is transparent in its political activity and does not attempt to improperly influence any government official or policy maker to gain a business advantage for the Group).

## 3. Policy Scope

This policy applies to all employees and directors of companies in the Group.

## 4. Definitions

The following definitions are used in this policy:

Definition	Meaning
<b>Board</b>	The directors of the board of International Personal Finance plc.
<b>Group</b>	International Personal Finance plc and all companies in which it directly or indirectly owns or controls the voting rights attaching to not less than 50% of the issued share capital or controls the appointment of the majority of the board of management.

## 5. Policy Requirements

The Group is apolitical and its employees and directors are expected to uphold this stance while carrying out their duties. Responsible corporate political engagement must be carried out within a framework of exceptional corporate governance and commitments by the Board to integrity, accountability and transparency.

The Group is politically neutral and does not make donations to political parties, nor receives donation or services from political parties.

- 5.1. No employee or director, in the context of their employment, is permitted to make a donation to a political party or offer any other form of inducement or advantage to a political party.



5.2. Employees and directors may engage in political activity and make donations to political parties in their own time, provided it is clear that they are acting in a personal capacity and not on behalf of the Group, or a company in the Group.

## 6. Lobbying

Where the Group does work with governments and other parties, such work must legitimately concern either issues which are important to our customers, employees / directors or its business. Any lobbying must be carried out in accordance with relevant policies, local laws, the principles of integrity and transparency and by adopting lobbying best practices (including within the trade bodies of which a group company may be a member).

## 7. Roles and Responsibilities

<b>Everyone</b>	All employees and directors of companies in the Group must comply with this policy.
<b>Group Legal Function</b>	Reviewing and updating this policy.

## 8. Policy governance

### 8.1. Breaches and Exceptions to Policy

<b>Exceptions to Policy</b>	No deviations from this policy are permitted unless they have been formally agreed with the Chief Executive Officer.
<b>Breaches of this policy</b>	All breaches of this policy must be notified to a member of the applicable local legal team, and will be recorded as a risk event in accordance with relevant local procedures. All breaches of this policy should be notified to the Corporate Affairs Director and the Chief Legal Officer.
<b>Whistleblowing</b>	If, for whatever reason, an individual feels uncomfortable raising a matter concerning a conflict of interest directly, and instead wishes to raise a matter anonymously, they can do so through our independent whistleblowing channels at <a href="https://report.whistleb.com/en/ipf">https://report.whistleb.com/en/ipf</a> for European, IPF Digital or Group related matters, or <a href="https://hacerlocorrecto.ethicsglobal.com/">https://hacerlocorrecto.ethicsglobal.com/</a> for Mexico.

### 8.2. Assurance

<b>Owner</b>	This policy is owned by the Corporate Affairs Director.
<b>Assurance mechanisms</b>	Reporting annually to the Nominations & Governance Committee on the compliance of this policy. Annual confirmation by each Corporate Affairs Director that no political donations have been made. Review by Policy Committee and Corporate Affairs.

## 9. Related Policies

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**Anti Bribery and Corruption Policy**

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**Competition Law Policy**

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**Conflicts of Interest Policy**

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**Gifts and Hospitality Policy**

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**Whistle Blowing Policy**