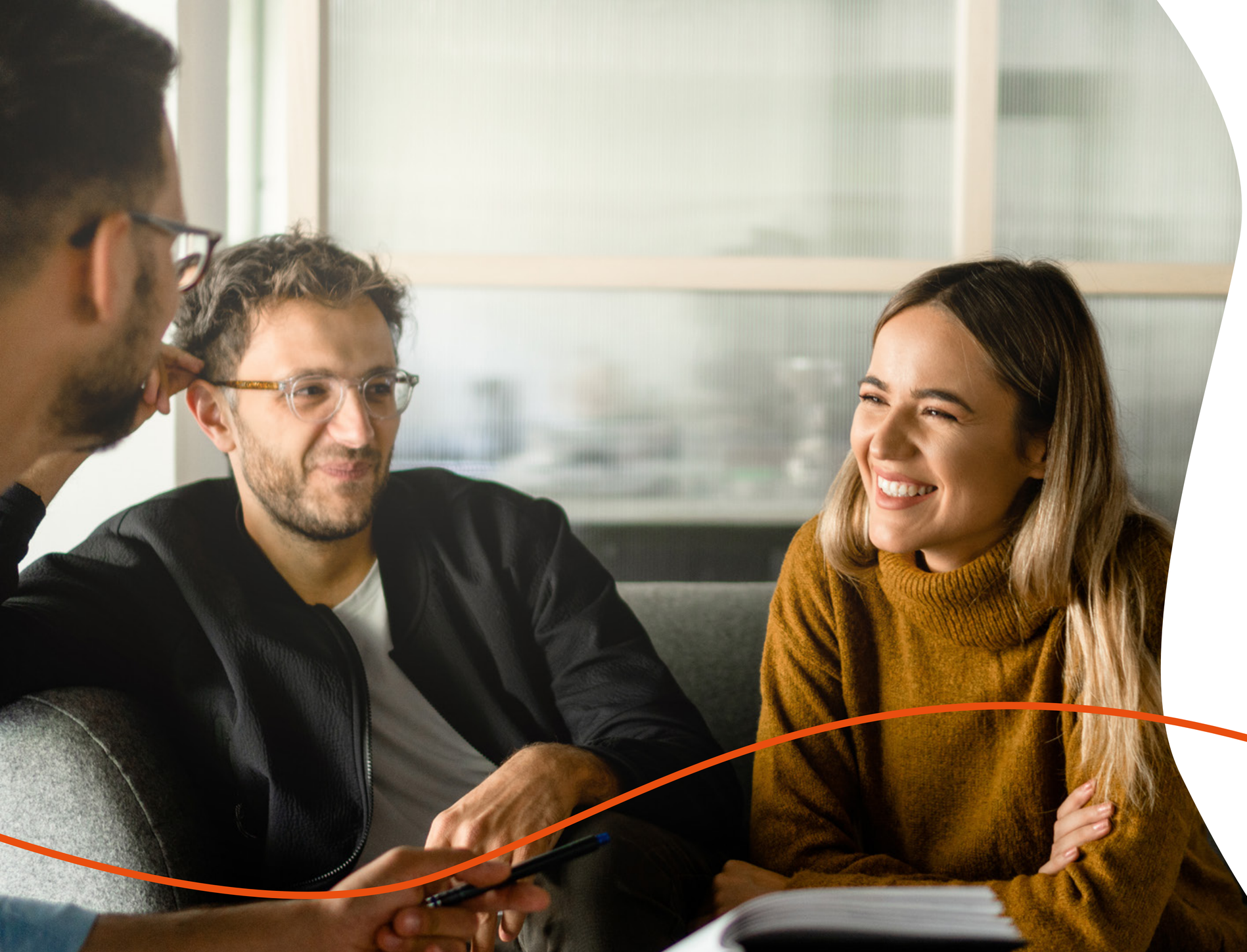

Lowell

Code of Conduct

April 25th 2022

Enter

Dear colleagues and stakeholders,

This company has built its reputation on the fundamental principles of honesty, integrity and trust. It's a reputation we all play an instrumental role in maintaining and growing.

We recognise the importance and impact of our work, and we want that impact to be a positive one. We know we'll be judged by the decisions and actions we all make on a day-to-day basis – whether it's by those we interact with directly (our customers, clients and colleagues) or our impact on the wider industry, communities, society and the environment. What we do and how we do it matters.

Our Code of Conduct sets out how we work as a company – what we expect and the ethical behaviours we ask our colleagues to adopt.

We know that colleagues work best when they're empowered. We want to give people the freedom to be themselves and the security to know they can speak out without recrimination. With the confidence and reassurance of a strong operational framework to act within and the knowledge of where to go for extra help and support should the need arise.

We're transparent about our business and report our financial results on our website. However, our success isn't just about the numbers – we also publicise our sustainability strategy and report on our current and future performance against key metrics.

The more we share, the better able we'll be to build wider trust and understanding of our business and the important role we play in our industry and wider society.

I ask that you carefully read and understand this Code of Conduct, and use it whenever needed, as a benchmark for how you interact and behave with those around you.

Thank you

Colin Storrar
Group CEO

"

Our aim is to always do the right thing by abiding by this code, our policies and procedures and by taking an ethical approach. This applies to everyone in the company.

We took our colleagues' thoughts and opinions on board when we developed this Code, to ensure that everyone has a voice.

If we all play a part, it will help us nurture the levels of trust, reliability and influence we have with clients, customers and society in general."

Andy Green
Group Chairman

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What is Our Code?

Our Code of Conduct (or Code) is a defining set of standards that govern the behaviour of every colleague within our organisation. Our Code functions with and is complimented by a variety of other more specific policies for particular areas of the business.

Where more clarity is required, you are encouraged to refer to these supporting policies or procedures in more detail, to ensure you are acting in the best or most appropriate manner. Links to additional documentation have been provided where relevant.

If you have any questions, suggestions or queries about this Code, please contact your manager or HR.

The Code and our Mission and Values

Our Code is intrinsically linked to our Mission and Values.

We're a Mission-led business. In our case, it means we do things differently – breaking new ground without breaking the rules.

Making credit work better for all applies to everything we do. We're committed to improving everyday life for people throughout the Lowell Group. This commitment and our appreciation for the impact of ethics across the business, makes outcomes better for everyone: our clients, consumers, people and investors.

Just as important as our Mission, are our Values, which guide everything we do as a business and as individuals.

Our values were conceived and refined in collaboration with our colleagues, which means they belong to us all and each one of us is constantly measured against them.

Our corporate values guide our culture, which is open, inclusive and diverse.

- We celebrate together when times are good and when we achieve our **ambitions**. We stick together when times are tough
- We're **pioneering** and set ourselves up for future success by being innovative in statistical and behavioural science, as well as in the way we work each and every day
- We want to be the best. If there's a better way to do something, we'll find it and make it happen
- We're **compassionate** – we see and respect the individuals behind the numbers, staying helpful, principled and fair in everything we do
- We strive for **excellence** by working together to exceed expectations, recognise success and deliver the best solutions
- We take **responsibility** and earn trust by always being open, reliable and accountable.

Leadership

Our Leadership philosophy is based on our Values and explains the crucial role our leaders play.

We expect our leaders to:

- Be accountable for our strategy, believe in our Purpose and live our Values
- Model, uphold and enforce the core tenets of our Code of Conduct
- Be resilient and navigate Lowell through turbulent times with confidence and competence
- Have the courage to take the initiative, to take ownership, to drive action and change and trust others to deliver their part
- Be compassionate, authentic and empathetic, empowering teams to deliver
- Be commercially focused, understand the broader needs of the business and the wider context in which we operate.

How is the Code structured?

The Code covers four key pillars:

- People
- Responsible & sustainable business
- Safeguarding assets and information
- Speaking Up

Who should follow the Code?

The Code applies to all colleagues at all levels within Lowell, including consultants, contractors and agency workers.

What is expected of our Colleagues?

As a set of standards, the Code establishes clear expectations for all colleague behaviour. Specifically, we expect our colleagues to:

- Work in an honest, sincere and trustworthy manner
- Behave ethically and in line with accepted standards of behaviour
- Report incidents of non-compliance with the Code or any other wrongdoing at work without hesitation.

While the Code provides an invaluable set of checks and balances, it is in no way exhaustive. In addition to the Code, all colleagues should ensure they follow, and are familiar with:

- All business policies, principles and standards
- Any laws and regulations which may apply to you and your area of work.

Together, the Code and these polices provide clear guidelines for you to refer back to, and points of contact, should you need further information.

Who should acknowledge the Code?

All colleagues are required to acknowledge that they've read and understood the Code and agree to following its principles. They're also expected to complete their annual training and report any breach of the Code.

What might be considered a breach of the Code?

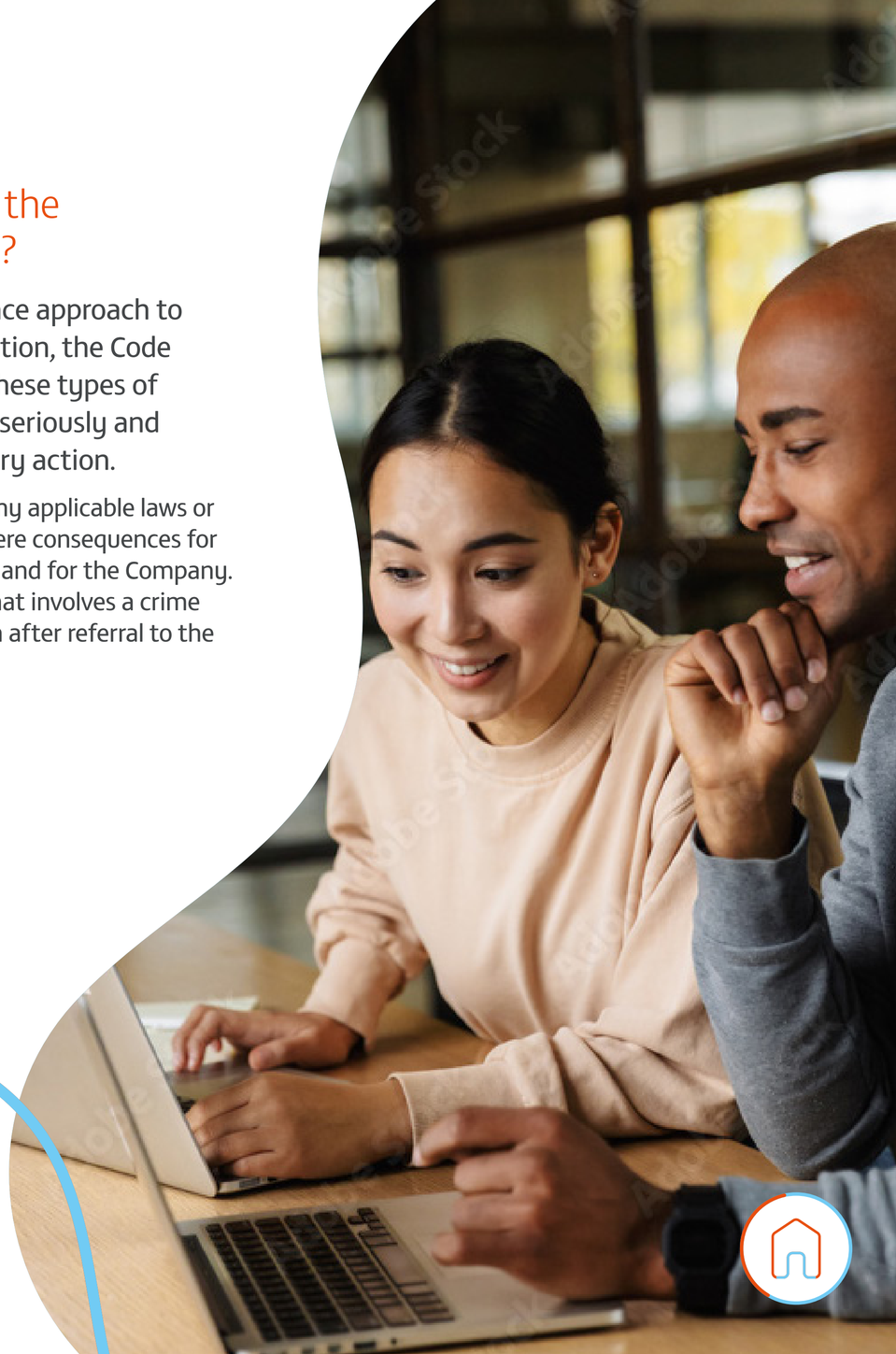
Certain behaviours (e.g., committing fraud, accepting a bribe, stealing company property and bullying) are very clear breaches of the Code, but the following may also be breaches:

- Asking for or allowing others to breach the Code
- Retaliating against another colleague or third party for reporting potential Code violations
- Failing to cooperate with investigations related to a possible breach of the Code
- Failing to maintain confidentiality of any information concerning an investigation of a breach of the Code
- Failing to report a known breach of the Code.

What happens if the Code is breached?

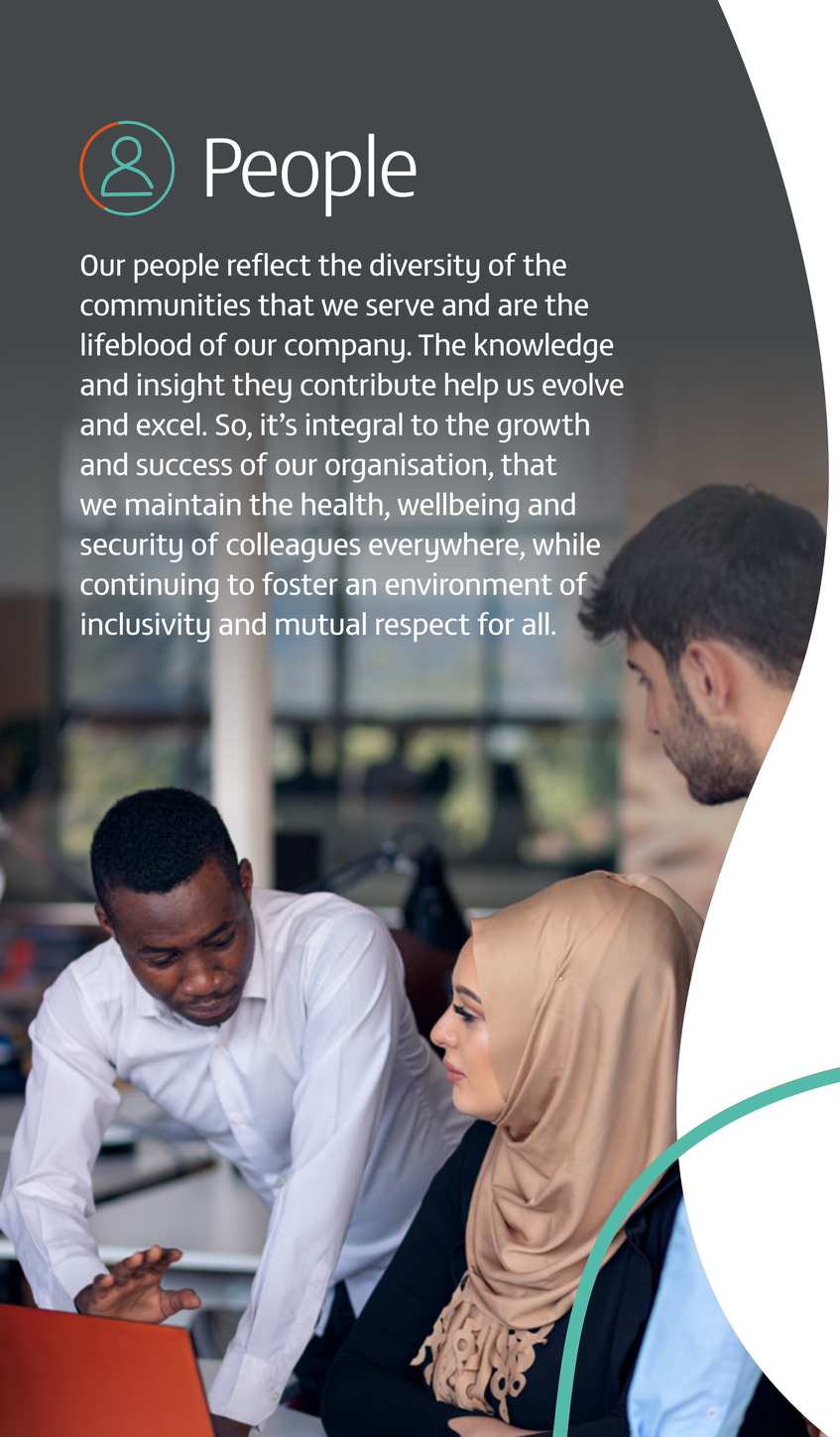
We have a zero-tolerance approach to breaches of law, regulation, the Code or company policies. These types of breaches will be taken seriously and could lead to disciplinary action.

Breaches of the Code or any applicable laws or regulations may have severe consequences for the individuals concerned and for the Company. Any breach of the Code that involves a crime could result in prosecution after referral to the relevant authorities.



People

Our people reflect the diversity of the communities that we serve and are the lifeblood of our company. The knowledge and insight they contribute help us evolve and excel. So, it's integral to the growth and success of our organisation, that we maintain the health, wellbeing and security of colleagues everywhere, while continuing to foster an environment of inclusivity and mutual respect for all.



Health and safety

Why is this important?

Providing safe and healthy working conditions for our colleagues is a business imperative, which is why we've developed and implemented a comprehensive set of policies and regulations around Health and Safety that we must all comply with.

This infrastructure has been put in place for the benefit of everyone, but there is an equal expectation that all colleagues follow established environmental, safety and health rules and guidelines and promptly report accidents, injuries and unsafe equipment, practices or conditions.

It's company policy to uphold these standards and maintain a safe work environment for colleagues, clients, customers, suppliers and visitors.

For additional guidance: ***See your regional Health and Safety Policies and Group People policy***

Key colleague conduct principles

- We expect our colleagues to perform their work in a safe manner
- Any potential dangers, hazardous practices or harmful behaviours should be reported to your line manager and/or local HR immediately
- Follow all the health and safety policies and procedures that apply to you and attend any training that's provided on those policies and procedures
- Our leaders are responsible for providing clear direction on health and safety issues and maintaining a healthy, safe workplace.

Human rights

Why is this important?

We will always and in all circumstances comply with applicable laws and respect internationally recognised human rights, across our entire business.

For additional guidance:
See Lowell's UK Modern Slavery statement

Equality, diversity, and inclusion

Why is this important?

We define diversity as all the visible and invisible differences that make us unique. This also takes into account diversity of perspectives, personality, work and life experiences, as well as religious and cultural differences.

Inclusion means embracing all colleagues in all circumstances, regardless of their differences. Everyone has the right to work in a professional atmosphere that promotes equality and prohibits any form of discrimination. Our commitment to inclusion creates an environment where our differences are not just respected but are valued and celebrated.

Diversity and inclusion are everyone's responsibility. We do not tolerate harassment, bullying or any mistreatment in the workplace or situations related to work. This includes harassment (both physical and verbal) related to gender, gender identity, gender expression, transgender status, sexual stereotypes, sexual orientation, class, race, religion, creed, colour, marital or family status, age, nationality, political association, or disability. Any behaviour of this kind could result in severe disciplinary action, up to and including termination of employment. We have a zero-tolerance policy regarding any form of violence.

For additional guidance:
See the Group People Policy on our Policy Hub

Key colleague conduct principles

- Identify and remove barriers to inclusion and make this a part of our daily practice and culture
- Provide equal opportunities for everyone in recruiting, hiring, training, promotion and pay
- Value and respect differences of opinion, experiences, characteristics, backgrounds and cultural identities. We promote employability and help people reach their potential through professional development
- Treat all applicants and colleagues equally, without any form of discrimination
- To achieve equality of opportunity, we recognise that to be treated fairly, sometimes people need to be treated differently. For example, those with disabilities may have specific needs
- Wherever we do business, we follow all applicable laws relating to discrimination in employment practices and strive to create a welcoming and inclusive workplace.

Everyone has the right to work in a professional atmosphere that promotes equality and prohibits any form of discrimination.

Responsible & sustainable business

In complying with the regulations and laws in each geography in which we operate, we uphold the implicit trust that exists between ourselves and the society we work within. Included in this social contract is a company-wide commitment that all activities and actions we undertake in pursuit of our business goals, have positive and beneficial social, environmental, and economic consequences.

Through the implementation of robust processes, transparent disclosure, and continuous improvement, we maintain the highest standards of integrity and business responsibility.

Governance

Why is this important?

We take good governance and our reputation very seriously. Our governance structure includes three lines of defence:

- Internal controls
- Risk management and compliance
- Internal audit.

Our operations are overseen by our Executive Committee, supported by our key governance committees. These committees and the individual business sub-committees ensure we follow rigorous and consistent governance processes across our activities.

- Group Risk Committee
- Group Audit Committee
- Group Executive Committee
- Group Remuneration Committee
- Nomination Committee
- Group Sustainability Development Group
- Group Diversity & Inclusion Council.

The Group structure is supported and enhanced by a wide range of regional groups and committees.

Compliance & Risk Management

Why is this important?

We hold ourselves to the highest possible compliance and ethical standards.

Compliance is one of our key risks as a business and is defined as:
the risk of legal or regulatory sanctions, monetary loss or reputational damage resulting from failure to comply with laws, regulations, ethical standards, prescribed practices, internal policies, and procedures and from fraud, corruption, or bribery.

We have a risk framework which sets out our approach to managing risk.

Its aim is to ensure risk management remains consistent across the company and fit for the nature of our business, our scale, and our business model.

Our intention is not to create a risk-free environment, but to develop a culture of informed risk-taking and decision-making.

Conducting business in the right way is vital to our reputation and future growth. We do not accept any behaviour or engage in any business practice that may be detrimental to our reputation or negatively impact the way we are perceived, by the markets we operate in.

We are committed to being honest, professional, and direct in all our business undertakings.

Regional policies and annual refresher training give our colleagues a comprehensive overview of our regulatory requirements as a business and a clear understanding of everyone's responsibilities.

Our intention is not to create a risk-free environment, but to develop a culture of informed risk-taking and decision-making.

Anti-fraud & anti-corruption

Why is this important?

Protecting our business and preventing fraudulent and criminal activity is an essential part of maintaining our Values and the trust of our customers, clients, and other stakeholders.

We also place the same expectation on our suppliers and clients and under no circumstances will we work with a company who engages in such activities. Fraud can have a significant financial and reputational impact on our company. To protect the interests of all stakeholders, it is essential that we are alert to fraudulent behaviour and do everything we can to prevent it.

Fraud covers a broad range of activities. Examples of fraud include falsifying documents, misuse of company assets and resources (including theft) and intentionally disobeying internal rules.

Any instances or suspicions of our colleagues becoming involved in fraudulent activity will be thoroughly investigated and the appropriate sanctions put in place.

For additional guidance: ***There is Regional mandatory training and regional policies, procedures or guidelines for fraud, corruption, and money laundering***

Anti-money laundering & counter financing of terrorism

Why is this important?

As a company, we will never undertake any business interactions that may be illegal, and we have measures in place to make sure our company isn't used for the purposes of money laundering, fraud, or other criminal activities such as the financing of terrorism.

We also place the same expectation on our suppliers and clients and will not work with any company who engage in such activities.

For additional guidance: ***See your Regional policies covering Ethics & Compliance, Anti-Money Laundering & Counter Financing or Terrorism Policy***

Key colleague conduct principles

- We all have a responsibility to protect our reputation by avoiding situations in which we could, however unintentionally, become involved in money laundering, fraudulent activities or terrorist financing
- We never knowingly deal with any supplier, contractor or third party involved or suspected of involvement with criminal activity or handling the proceeds of crime
- Make sure that any business transactions conducted as a company never involve acquiring or using the proceeds of criminal activity (whether cash or other property).
- Wherever you work and whatever your role, you should protect the company resources and assets entrusted to you.

Conflicts of interest

Why is this important?

It is the responsibility of all colleagues to consistently act in the best interest of the company. This is particularly relevant to the issue of conflicts of interest. Being aware of the risks that conflicts of interest pose and avoiding them, will help protect the business and reputation of our company and its colleagues.

Conflicts of interest typically arise when an individual's judgement or decisions have been compromised by an element of personal, social, or financial influence. Situations such as where a colleague's relationship with another party extends beyond the professional e.g., family, friendship etc., or involves personal financial links.

Each region has its own policy around what constitutes a conflict and how to report it, and covers a variety of different scenarios and actions, such as: handling accounts for people where there is a personal relationship or avoiding any involvement or decision-making with a work situation where a relationship exists.

For additional guidance:
See your Regional Anti-Bribery, Anti-Fraud & Anti-Corruption policies

Key colleague conduct principles*

- Any situation that could potentially result in a conflict of interest, should immediately be reported to a line manager
- Avoid situations where family or other personal relationships conflict or appear to conflict with your obligation to act in the best interest of the company
- Certain personal relationships can interfere with independent judgment and can create other issues (e.g., colleague favouritism or nepotism)
- Colleagues should also be transparent about any additional forms of employment or secondary income and should review all guidelines pertaining to engaging in fiscal relationships with suppliers, competitors etc., which could trigger a potential conflict
- Personal relationships are those that occur beyond your work environment, such as:
  - Family or familial relationships (spouse or partner, (step)parent, (step)child, (step)sibling, nephew, niece, aunt, uncle, grandparent, grandchild, or relations by marriage, such as brother/sister-in-law)
  - Other close personal friendships or relationships.

*please note, additional regional requirements are in place.

Gifts & hospitality

Why is this important?

Our guidance around accepting and giving gifts and hospitality is designed to protect both our colleagues and our reputation. The offering or receiving of gifts, entertainment, and hospitality (which could include travel) should never compromise the integrity of business decisions or the loyalty of the people involved or be perceived in any way as a bribe.

Any gift, entertainment, or hospitality:

- Should have a legitimate purpose
- Should not place the recipient under any obligation
- Must not offer, promise, or give something of value with the intent to improperly influence any act or decision
- Must not be proffered with the intent of compromising the recipient's ability to make objective business decisions.

For additional guidance: ***See your Regional Anti-Bribery, Anti-Fraud & Anti-Corruption policies***

Key colleague conduct principles*

- We should all keep in mind that receiving gifts, hospitality and entertainment could result in a potential conflict of interest. Never let this affect your ability to make objective business decisions
- Be prepared to politely decline any offer that is not in line with policy
- This is an area where each region has its own specific policies and procedures which should be referred to alongside this Code.

*Please note, additional regional restrictions are in place.

Working with other organisations

Why is this important?

We only work with clients, suppliers and business partners who operate in compliance with laws and regulations, adhere to good business practice and have high ethical standards. We also scrutinise our partners' environmental policies as part of our commitment to the wider society.

Clients

Our clients care deeply about how we treat their customers, which is why one of our key metrics for client success is the degree to which our clients think we do right by their customers.

Working with suppliers

Every aspect of our relationship with our suppliers is built around respect and mutual trust and is key to our long-term success. Our tendering processes and contracts are fair and transparent, and we have favourable payment terms.

For additional guidance: ***See your regional procurement policy***

Key colleague conduct principles

- All regional policies, procedures and guidelines should be followed when onboarding new suppliers
- Give suppliers clear guidance on payment terms and follow the process to make sure they are paid on time
- Set up any new suppliers on the appropriate system for your region
- Pay all suppliers by raising a PO (Purchase Order) via the appropriate system for your region.

Business communication (including social media)

Why is this important?

As with most companies, we have dedicated teams tasked with ensuring all corporate communications support and grow our brand and reputation in the marketplace. But the responsibility for maintaining and protecting this reputation through the way we communicate, falls on us all.

Diversity of opinion and thought is something we support and encourage in all our colleagues, if these opinions are communicated in a mindful and considerate manner.

For additional guidance: ***See the Social media policy, Regional External Communications Policy and Corporate Communication policy (Nordics)***

Key colleague conduct principles

- With all communications, exercise common sense – always be professional and appropriate
- Always refer to the social media policy if you have any reservations about what you are thinking of posting
- When posting content on social media we expect you to not bring the company into disrepute, breach confidentiality or copyright, break the law (in the region), or publish offensive or discriminatory content or opinions.

Environment & social responsibility

Why is this important?

Sustainability is at the heart of how we build trust in our business and underpins our mission to make credit work better for all. We want to continue to lead the way as a responsible company and make a real sustainable difference.

In 2021, we worked together to define our Sustainability Strategy to help make sure our business decisions support our Mission and the wider societal need to work towards a more inclusive, fair, and sustainable future. To achieve these aims, we have set out clear goals and ambitions across four key areas – our customers and clients, colleagues, communities and the environment.

With continuous improvement at the forefront of all that we do, we have created a Sustainability Scorecard to measure and assess our performance against these goals so we can be held accountable for our impact.

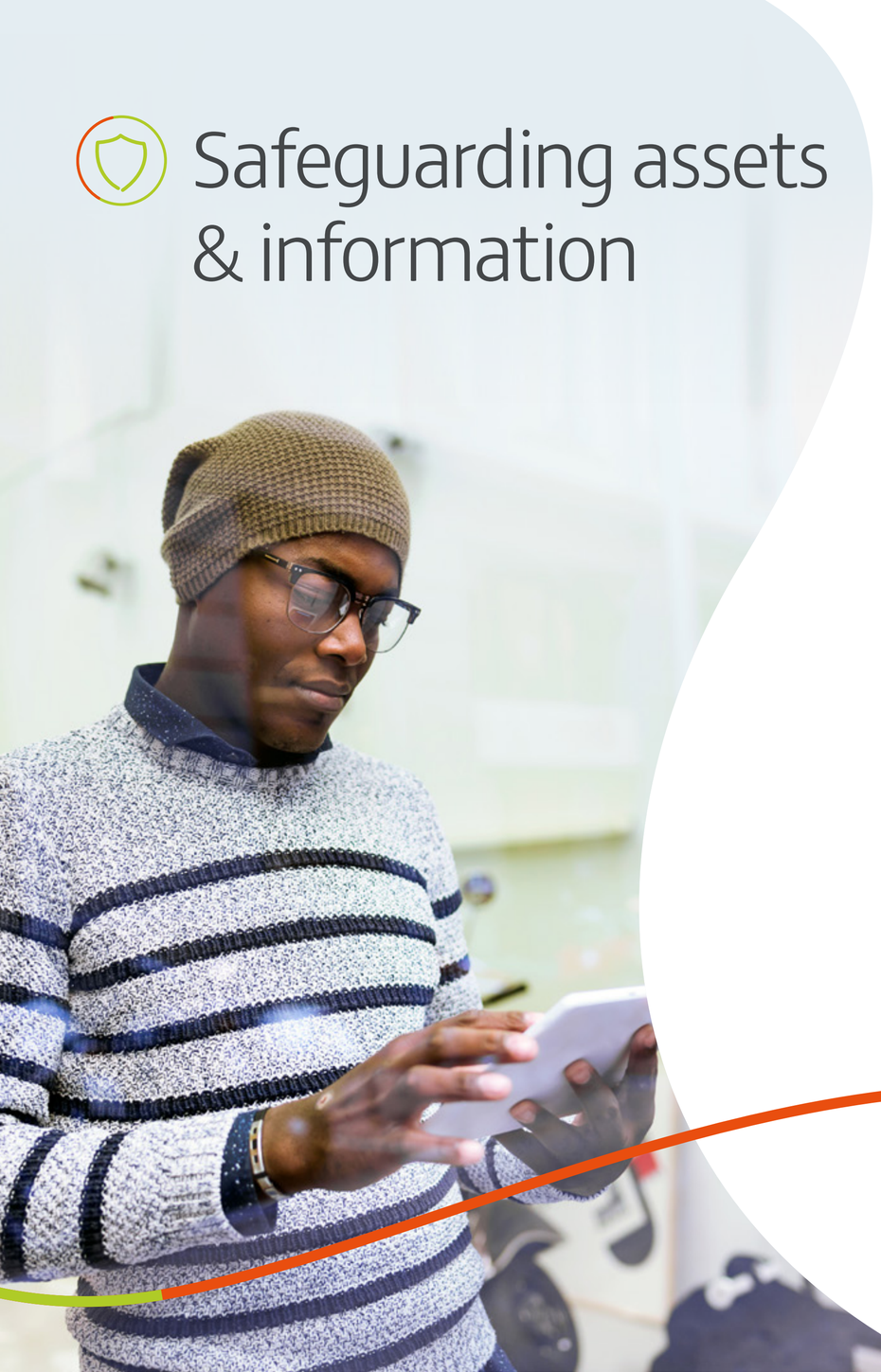
For additional guidance: ***See the 2021 Sustainability Report***

Key colleague conduct principles

- We are committed to minimising our impact on the environment and addressing critical issues, including climate change and the responsible use of natural resources
- We recognise the urgency of climate change and fully support all efforts to reduce its impact across every aspect of our organisation
- We limit our own environmental footprint by setting targets and reducing our own emissions through responsible business travel, energy-efficient offices and procurement of renewable energy
- We are committed to increasing the positive impact we have on society by growing our business in a sustainable way that helps to improve people's lives and strengthen communities.

To achieve these aims, we have set out clear goals and ambitions across four key areas – our customers and clients, colleagues, communities, and the environment.

Safeguarding assets & information



Information is the lifeblood of our business. Whatever our position or role and wherever we are located, we have an obligation to guard and protect every asset and resource we engage with or are responsible for.

Assets can refer to both physical assets – computers, mobile devices, corporate vehicles - and other intangible assets – client data, product, business and customer data and anything else that falls under the banner of intellectual property (IP). Mishandling of resources and assets can have a detrimental effect on how we function as a business, both financially and operationally, as well as have potential legal ramifications.

We have a collective responsibility to ensure our assets and resources remain safe at all times and are only used in a sensible and professional manner, for the purpose they were created for.

Company assets & security

Why is this important?

Given the extensive amount of time and resources allocated to developing and maintaining our company-wide assets, it's extremely important we follow the appropriate usage and security procedures to ensure they remain safe from loss, damage, theft, and/or misuse by unauthorised parties.

For additional guidance: ***See the Group Information Security Policy***

Key colleague conduct principles

- Company resources should only be used for their intended business purposes, unless otherwise authorised. Occasional personal use of certain company resources is sometimes unavoidable, but should be done so using common sense and judgment
- Any suspected leak of information should be reported promptly in accordance with acknowledged security protocols and local reporting requirements. If an incident involves personal data, it will also need to be logged with the relevant Information Risk teams
- The selling, lending, borrowing, passing on, or use of any company asset without authorisation, puts our company at serious risk, and must be avoided
- Any potential damage or loss to the Group's assets (including a suspected or actual IT security threat) must be reported to your manager and to the IT service desk
- It is all our responsibility to use strong passwords we regularly update and keep these and any user identification secure and private.

Speak Up

Every colleague in this company is committed to working together in an ethical, legal and socially responsible way. But there is always the possibility of encountering situations or witnessing behaviour that gives cause for concern. Should this happen, we have both the right and obligation to speak up about what we have seen or heard.

It's important then that we take action, both so the behaviour or situation can be addressed and to provide any support should it be needed. That's why we've made sure all our regions have clear independent channels for reporting questionable actions, fraudulent or unethical behaviours.

Reports can be made either directly to the designated regional 'speak up' colleagues, who will take the report forward, or can go through the individual's direct line manager, unless they're potentially involved, or there is some other kind of conflict.

All reports can be anonymous and anyone who is acting in good faith will be protected and not subject to any form of reprisal.

For additional guidance:
See Regional speak up or whistleblowing policies, procedures or guidelines

How to Speak Up and non-retaliation

How to Speak Up

If you see or hear anything which goes against our Code, you have an obligation to inform the leadership team immediately. You can do so by:

- Speaking to your manager or another member of the management team
- Using our reporting processes to raise your concerns officially. This is anonymous and risk free, with no repercussions or reprisals for the person sharing their concerns.

Non-retaliation

There will be no repercussions if you report a situation, you have concerns about, even if it eventually turns out to be a legitimate action. Never assume something is right just because it has always been done that way – if there is any suggestion of impropriety, do not hesitate to make someone aware of it.

More importantly, we will not tolerate any form of threat or intimidation which might take place in retaliation against anyone who has either come forward or has been assisted in doing so.

If this has happened to you, or you are aware of it happening to others, please report it immediately.

For additional guidance: ***Regional whistleblowing policies, procedures, or guidelines. UK colleagues should also refer to FCA breach reporting guidance***

Who can I talk to?

- Do you feel comfortable talking to the person(s) involved?
- Do you feel comfortable discussing the concern with your line manager?
- Is there a local ethics & compliance officer you can approach?

If you feel that the previous options are not suitable or if you have not resolved your concern, follow regional procedures for reporting or contact HR.

You should speak up when ...

- You have doubts about the legality of something you saw ...
- You suspect company assets may have been misused
- You witnessed a colleague accepting a gift from a questionable source ...
- You believe something you saw goes against the Code of Conduct ...
- You suspect a fraud has been committed ...
- You witnessed or experienced discriminatory, coercive or intimidatory behaviour.

Speaking up is never easy but we encourage you to do so. Be assured all concerns raised will be dealt with appropriately and in full confidence.

Lowell