

Labour and Human Rights Statement

Revision history

VERSION	DATE	DESCRIPTION
1.0	16.09.2021	Approved by Chief Brand and Sustainability Officer

1. INTRODUCTION

B2Holding ASA and its subsidiaries (jointly referred to as “**B2Holding**” or the “**Group**” and local subsidiary referred to as “**Business Unit**”) have a valuable reputation as a solution-oriented and trustworthy player within the debt collection industry. Honesty and fairness are fundamental principles in B2Holding’s way of doing business and it is recognised for respecting its **Customers** and **Business Partners**.

B2Holding’s Code of Conduct supports these fundamental principles and is the Group foundation for building and sustaining professional and long-term relations with its **Stakeholders** and maintaining high ethical standards in every decision made.

In addition to respecting and complying with the applicable laws of each country where the Group operates, and to implementing the values anchored in its Code of Conduct, B2Holding is committed to respecting labour and human rights, as emphasised its support to the **UN “Protect, Respect and Remedy” Framework** for business and human rights and its participation in the **UN Global Compact**, and by acting in accordance with the **Ten Principles** set forth therein.

B2Holding is committed to ensuring respect for the inherent dignity of people and their inalienable rights as a fundamental part of its corporate responsibility, and as an essential requirement for conducting its business activities in any country or social environment.

2. PURPOSE, SCOPE AND APPLICATION

The Labour and Human Right Statement (referred to as the “**Statement**”) outlines the labour and human rights recognised by B2Holding to its **Employees** irrespective of their role and the country in which they work, to its **Customers**, and to the **Local Communities** where the Group operates.

This Statement is to be read in conjunction with the Sustainability Policy.

3. DEFINITIONS

Business Partners – includes Vendors, Clients, Suppliers, Investors, and more generally any third party with which B2Holding does business.

Clients – companies (primarily banks and financing companies, but also telecom operators, retail and utility companies) to which B2Holding is providing debt related services, acting on their behalf.

Customers – any natural person owing the debt (resulting from a non-performing loan) subject to recovery process.

Employees – all B2Holding directors, officers, staff, temporary workers, interns, consultants, contractors, or any other persons who are or were employed by a Business Unit or otherwise works or worked for B2Holding, regardless of the duration of their employment contract, the type of relationship or geographical location.

ILO – the International Labour Organization is the UN specialised agency which seeks the promotion of social justice and internationally recognised human and labour rights. The core of international labour law is formed by eight conventions, including ILO Conventions 87* and 98* (*see below).

ILO Convention 87 – the ILO Freedom of Association and Protection of the Right to Organise Convention sets out the rights for workers' and employers' organisations to establish and join federations and confederations and any such organisation, federation or confederation shall have the right to affiliate with international organisations of workers and employers.

ILO Convention 98 – the ILO Right to Organise and Collective Bargaining Convention sets out rules for the freedom of unionisation and collective bargaining, principles that belong to the core values of the ILO. The Convention ensures workers protection from discrimination for their membership or engagement in union activities.

Investors – financial entities co-investing in debt portfolios together or in cooperation with B2Holding.

Local Communities – any community of people living or having rights or interests in a distinct geographical area.

NGOs – stands for Non-Governmental Organisation is a non-profit organisation that operates independently of any government and is operated by voluntary citizens towards a common interest, typically one whose purpose is to address a social or political issue.

Services – debt related services such as servicing of debts on behalf of Clients and other debt management solutions.

Stakeholders – any party that has an interest in B2Holding and can either affect or be affected by the Group business and operations such as B2Holding Employees, Customers, Vendors, Clients, Suppliers, and Investors.

Suppliers – any natural or legal person and their employees, agents, representatives, and subcontractors who supply goods and/or services to B2Holding.

UN “Protect, Respect and Remedy” Framework – rests on three pillars: the state duty to protect against human rights abuses by third parties, including business, through appropriate policies, regulation, and adjudication; the corporate responsibility to respect human rights, which means to act with due diligence to avoid infringing on the rights of others and to address adverse impacts that occur; and greater access by victims to effective remedy, both judicial and non-judicial.

UN Global Compact – is a non-binding United Nations pact to encourage businesses and firms worldwide to adopt sustainable and socially responsible policies, and to report on their implementation. The UN Global Compact is a principle-based framework for businesses, stating ten principles in the areas of human rights, labour, the environment, and anti-corruption.

UN Global Compact’s Ten Principles –

Human Rights

- 1 – Businesses should support and respect the protection of internationally proclaimed human rights; and
- 2 – Make sure that they are not complicit in human rights abuses.

Labour

- 3 – Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- 4 – The elimination of all forms of forced and compulsory labour;
- 5 – The effective abolition of child labour; and
- 6 – The elimination of discrimination in respect of employment and occupation.

Environment

- 7 – Businesses should support a precautionary approach to environmental challenges;
- 8 – Undertake initiatives to promote greater environmental responsibility; and
- 9 – Encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

- 10 – Businesses should work against corruption in all its forms, including extortion and bribery.

Vendors – companies (primarily banks and financing companies, but also telecom operators, retail and utility companies) selling debt portfolios to B2Holding.

4. B2HOLDING OBJECTIVES

With the implementation of this Statement, B2Holding aims to achieve the following objectives:

- To implement the necessary procedures to ensure its commitment to meet the minimum requirements regarding labour and human rights towards all Stakeholders such as Employees, **Local Communities** and Suppliers,
- To provide Employees with targeted training in specific labour- and human rights areas relevant to their roles, so that they can contribute to the achievement of B2Holding objectives and
- To measure and report annually on its performance, against the targets set. B2Holding is committed to reviewing its performance on a yearly basis, performing the necessary updates accordingly.

5. B2HOLDING PRINCIPLES

B2Holding's guiding principles related to labour and human rights are the following:

B2Holding Employees:

- B2Holding respects the fundamental human rights to all Employees and has zero tolerance towards:
 - Any form of discrimination based on race, gender, language, ethnicity, religion, political opinion, nationality or social origin, age, disability, or any other characteristic. Moreover, B2Holding shall actively promote women's full and effective participation, equal opportunities and equal treatment with regards to recruitment, hiring, training, development, wages and merit based internal promotion with transparent and open communication,
 - Harassment or violence of any kind. Business Units shall protect Employees from any form of verbal, sexual and psychological harassment, abuse, threats, or labour bullying in the workplace by any fellow Employee or Manager and
 - Discriminatory behaviour in the employment-related decisions from hiring to termination that are based on illegal or discriminatory criteria.
- B2Holding strives to maintain an inclusive work culture in which each Employee feels respected and valued and has the opportunity to develop and grow in line with business needs and personal aspirations,
- B2Holding shall promote dignified employment that enables economic empowerment of Employees by promoting decent work conditions, and having no tolerance to forced labour, or any form of labour exploitation, modern slavery or child labour. The minimum age for full-time employment must be according to the legal minimum age for employment under the local applicable laws,
- B2Holding respects Employees' freedom of association and their right to collective bargaining agreements, as well as the right to form, join, or not join a trade union, or other organisation of their choice, as well as to bargain collectively in support of their mutual interests in compliance with the applicable labour laws and in accordance with the **ILO Convention 87** on freedom of association and protection of the right to organise and **ILO Convention 98** on the right to organise and collective bargaining,
- B2Holding ensures adequate health and safety working conditions in all premises by complying with all legal requirements and adopting measures and procedures to prevent illnesses and injuries at the

workplace. B2Holding is responsible to establish training sessions for the Employees as well as providing information instructions and supervision for its Employees to ensure they are competent to do their tasks with regards to health and safety issues,

- B2Holding will provide training and educational courses to all Employees to raise awareness on equality, diversity and inclusion based on a multi-culture organisation,
- B2Holding fosters a culture where knowledge sharing is encouraged to upskill, improve creativity and innovation and hiring guidelines are developed that ensure the creation of decent and stable jobs, as well as to providing opportunities for career development,
- B2Holding promotes flexibility and work-life balance initiatives that may help Employees to better balance between professional and personal lives,
- B2Holding is committed, as a minimum, to comply with national laws as well as industry standards in the event of collective redundancies,
- B2Holding complies with the applicable laws, regulations, and industry standards in relation to minimum wages, overtime, benefits and working hours in all countries where the Group operates. Unless the applicable laws provide otherwise:
 - Employees:
 - are not allowed to work more than the limits on regular hours and over time allowed by local laws and regulations,
 - are entitled to at least one day off per week and must be given reasonable breaks over daywork and sufficient rest periods between shifts,
 - Wages:
 - for overtime that shall be remunerated must be paid on a regular basis,
 - reductions are not permitted as a disciplinary measure,
- Employees are entitled to a written and legally binding employment contract and
- Employees are entitled to sick leave, annual holidays, parental leave, or any other leave provided by national legislation.

B2Holding Customers:

- B2Holding is committed to safeguarding the human rights of its Customers by:
 - Providing **Services** that are respectful with their human rights and information is accurate and truthful,
 - Operating in compliance with all applicable laws,
 - Ensuring the right of privacy, diligent and appropriate use of personal data, in accordance with B2Holding policies and procedures and
 - Carrying out ethical and responsible collections which follow group-wide principles. To this end, the Group has policies and procedures in place to ensure Customer fair treatment.

Local Communities:

- B2Holding is committed to safeguarding and respecting the rights of the Local Communities in all countries the Group operates,
- B2Holding is committed to promoting mutual relationship with local Communities in the countries the Group operates by:
 - Establishing and maintaining close contact with Local Community and industry associations, to better understand the Local Community's concerns and expectations,
 - Bringing relevant issues to the attention of the appropriate organisations or authorities and
 - Complementing the Government, **NGOs**, and other actors' efforts through community assistance projects such as scholarships, employment opportunities and local training.

6. ROLES AND RESPONSIBILITIES

The Chief Brand and Sustainability Officer is the owner of this Statement.

Each local CEO is responsible for ensuring the local implementation and application of this Statement in its Business Unit.

7. REVIEW

To ensure continuing suitability, adequacy and effectiveness of this Statement, the Chief Brand and Sustainability Officer shall review, update and/or revise it, as appropriate, on a yearly basis.