



## **CODE OF ETHICS AND PROFESSIONAL CONDUCT**

This Code of Ethics and Professional Conduct defines the values, principles and rules of professional conduct that the personnel of CREDITEXPRESS GROUP must adhere to and apply in their activity within the organization in line with the values and goals of the Group.

### **Mission**

CREDITEXPRESS GROUP aims to help both corporate and personal finances flowing smoothly. We return assets to our Partners by legal and ethical methods, contributing to the financial health of Society.

### **Values and guiding principles**

We always carry out our work transparently and professionally with the most advanced collection methods and with the required empathy, at the same time respecting the principles set out in the Group's Code of Ethics.

Values and fundamental principles are embodied in the daily life of the Companies within the Group – in order to contribute to the development of the organization and achieve goals.

The Code of Ethics and Professional Conduct of CREDITEXPRESS GROUP includes the values that have formed the basis of our past success and which will support the future success of the organization.

The following are our key values:

### **INTEGRITY**

CREDITEXPRESS GROUP commits to fair and honest conduct demonstrating consistency between actions, values, principles and national laws. We will seek always to build trust, show respect and perform with integrity.

### **RESPONSIBILITY**

CREDITEXPRESS GROUP commits to meet its obligations and to take responsibility for their own actions, as well as to constantly seek to raise the level of professional knowledge and skills of its staff.



## **RESPECT**

CREDITEXPRESS GROUP will demonstrate respect in the way it interacts during the course of performing all its professional activities.

## **CONFIDENTIALITY AND DATA PROTECTION**

### ***Loyalty***

CREDITEXPRESS GROUP respects professional secrets, and displays integrity in the way it communicates, always ensuring exchanged information is true and correct. Any form of improper or false usage of information that may violate the obligations to clients and debtors is strictly forbidden because it can damage the reputation of the Companies and the Group.

### ***Data Protection***

CREDITEXPRESS GROUP treats the data of Clients and the debtors confidentially and applies data management, data security and processing protocols that exceed the requirements of current legislation.

### ***Confidentiality and Data Protection***

CREDITEXPRESS GROUP handles all data and information in its possession confidentially. The security of all personal data is a fundamental right of the individual, thus it is an evident duty to protect all data handled within the companies of the Group. We protect all data entrusted to us against unauthorised access.

## **COMPLIANCE**

### ***Compliance***

CREDITEXPRESS GROUP performs its activity in compliance with the laws and regulations at national and international level – both in EU countries and non-EU countries.

All subsidiaries of CREDITEXPRESS GROUP must ensure they comply in their acts and deeds with relevant laws, regulations and internal rules and they must act in conducting their activities in a way that respects all laws and professional ethics.

### ***Relation to authorities***

CREDITEXPRESS GROUP is committed to collaboration with local and central authorities and other entities on principles of fairness, transparency and legal and regulatory compliance. Group members will not engage in activities which could result in compromising the independence and economic goals of the Company and which go against the principles and the values of this Code, as well as any national and international laws.

### ***Fighting corruption***



CREDITEXPRESS GROUP enforces a zero-tolerance policy regarding corruption and fraud.

### ***Money laundering***

CREDITEXPRESS GROUP does not take part in money laundering activities and commits to developing and implementing policies and mechanisms for combating money laundering according to international directives and standards, as well as applicable national and international legislation.

## **NON-DISCRIMINATION**

### ***Non-discrimination***

CREDITEXPRESS GROUP will not discriminate against anyone on the basis of race, gender, religion, sexual orientation, political affiliation or any other criteria that may form the basis of discrimination.

### ***Equity and diversity***

CREDITEXPRESS GROUP guarantees equal and non-discriminatory treatment in relation to business partners, debtors, collaborators and Clients.

CREDITEXPRESS GROUP will behave professionally and will ensure the level of transparency, impartiality and effectiveness, required to earn and maintain the trust of business partners, collaborators, debtors and Clients. We are committed to ensure equal treatment and not to discriminate on grounds of nationality, sex, origin, race, ethnicity, disability, age, religion or political beliefs.

### ***Harassment***

In the CREDITEXPRESS GROUP abuse, threats, intimidation or physical, verbal or sexual harassment are not tolerated.

## **OBJECTIVITY**

### ***Objectivity***

CREDITEXPRESS GROUP is impartial and does not allow its professional judgment to be influenced by bias, conflict of interest or other in factors that would effect their professional activity.

### ***Avoiding conflicts of interest***

CREDITEXPRESS GROUP must not engage directly or indirectly in business partnerships with individuals or legal entities which could negatively impact the proper, honest and conscientious performance of professional duties; we must avoid any direct or indirect involvement in any kind of activities, associations or investments which influence or could influence the individual decisions of any personnel when they act in the interest of any of the CREDITEXPRESS Companies.

***Fair competition***

CREDITEXPRESS GROUP will behave in a respectful and honest manner with their competitors, aiming to ensure fair and equitable competition in the field.

***Protecting Company assets***

The Group companies' assets will not be used for personal gain. All business transactions must be authorized by management in accordance with the transaction rules and regulations and comply with delegation of signature authority and processes for internal review and approval.

***Social Responsibility***

CREDITEXPRESS GROUP will develop a social responsible business culture that includes business ethics, customer rights, economic and social equality, environmentally friendly technology, fair labour treatment, transparent relationships with the public authorities and integrity.

***Relation to business partners***

CREDITEXPRESS GROUP promotes the open and honest interaction with clients and other business partners, by carrying out contractual relationships honestly and legally correctly.

We base our relationships with partners and clients on legal, effective and fair practices, building long-term relationships demonstrating value and integrity.



## CODE OF ETHICS

- ∂ The Group's employees while performing professional activities are obliged to adhere to the provisions of the Code.
- ∂ The Group and its subsidiaries must ensure a high level of professionalism in their employees, and prevent actions that could harm the reputation of the Group.
- ∂ The Group's employees are bound to keep confidential information that contains commercial secrets, personal data and ensure the confidentiality of any other information that is protected by current legislation.
- ∂ Relations of employees with customers, representatives of state authorities, representatives of the media and debtors are based on the principles of integrity, honesty, professionalism, respect, priority of clients' interests, inviolability of obligations, disclosure of information permitted to be transferred by law.
- ∂ We always work transparently and professionally, using the most advanced methods of recovery, but at the same time, with the necessary goodwill, in accordance with the principles outlined in our Code of Ethics.
- ∂ The Group's employees should behave decently and politely in the performance of official duties and outside of working time. They shall protect the image of the Group and its subsidiaries.
- ∂ Each employee is responsible for the implementation of the provisions of this Code.
- ∂ Code of Conduct and Code of Ethics set on both, Group level and local regulations, and are constantly monitored, and local managers are responsible that all employees comply all provisions.
- ∂ Violation of the provisions of the Code may be regarded as an act incompatible with the status of an employee of the Company and to serve as a basis for disciplinary action up to and including dismissal

## **GENERAL RULES AND PROVISIONS OF CONDUCTS**

The rules of conduct apply to all employees at all hierarchical levels in each subsidiary of CREDITEXPRESS GROUP.

Directors and employees of the company are informed about the provisions of the Code and must abide it during the course of their employment and be aware of responsibility for their actions or inactions.

The Code of Conduct and the Code of Ethics have been developed with the aim of introducing high standards of conduct of CREDITEXPRESS GROUP employees in the exercises of any interaction with debtors, borrowers, customers, partners, and during intra-group interactions, and with the aim of monitoring compliance with these standards.

Local country managers are responsible of introduction and following of the Code of Conduct of CREDITEXPRESS GROUP.

Employees are expected to be responsible and behave according to this Code of Conduct.

If employees notice behavior and situations that are not in accordance with this Code, they shall inform their superior or responsible person to enable them to respond and alert employees who do not respect the items of the Code.

A manager or supervisor who misses noticing an unwanted behavior or does not take steps to remove it also violates the rules of this Code.