


Sustainability Report

2023



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» Statement from our CEO

**Dear shareholders, customers,
and partners,**

Welcome to our second sustainability report for the Creditinfo Group. Since our founding in 1997, our mission has always been to enhance financial inclusion and improve lives. We have demonstrated our commitment to this goal from day one in all markets we operate. However, traditional financial reports often fail to fully capture the essence of our business and the foundational principle of social sustainability that drives us every day.

This sustainability report aims to bridge that gap. Here we hope to provide you with deeper insights into our dedication to sustainable practices.

This report will offer our stakeholders a more comprehensive understanding of how integral sustainability is to our operations and our values.

Looking ahead, we are excited about our on-going product development in the ESG, KYC, and AML space to only name a few areas where we can push sustainability further. These developments will enhance our ability to create a safer, more transparent financial ecosystem.

Thank you for taking the time to read about our journey and our ongoing efforts to make a positive impact.

Warm regards,

A handwritten signature in black ink that reads "Satrajit Saha".

Satrajit Saha
CEO

- Creditinfo Group

» Statement from the director of sustainability



I am pleased to present to you our second sustainability report. This year we've decided to follow the European Sustainability Reporting Standards (ESRS) to the extent feasible.

We decided to follow the ESRS even though we are not within the scope of the corporate sustainability reporting directive (CSRD). We simply believe that the ESRS will be the way forward for corporate sustainability reporting.

This meant that we conducted our first attempt double materiality assessment to understand which datapoints should be included in our report.

I hope that this report provides a good snapshot of our impact and risks and how we manage those. What stands out is the strong commitment we have towards our own workforce and the societies we operate within. I personally am excited to witness the positive impact Creditinfo has on the societies we service.

A handwritten signature in black ink, reading "Reynir Smári Atlason".

Reynir Smári Atlason
Managing director of Sustainability
- Creditinfo Group



» ESRS 2 – General disclosures

Basis for preparation

BP-1 - General basis for preparation of the sustainability statement

The sustainability statement is prepared and administered by Creditinfo group's director of sustainability.

a) The scope of the sustainability statement is on a consolidation basis. The operations included in this sustainability statement are from our businesses in Czech republic, Estonia, Iceland, West Africa, Kenya, Latvia, Lithuania, Malta, Morocco, Namibia, Oman, Tanzania, Uganda and Ukraine.

b) The statement is in line with the consolidated financial statements of Compass UK Topco Ltd.

c) When it comes to the value chain, data vendors, the users of our services and persons affected by our operations are evaluated to the extent possible in the double materiality assessment. These groups were however not part of the materiality process, but reflected upon in the undertaking.

d) We have not omitted a specific piece of information because of intellectual property, know-how or because of a result from an innovation.

BP-2 – Disclosures in relation to specific circumstances

Time horizons

a) Our definitions of medium and long-term time horizons are chosen in the context of irremediability.

- Long-term: Impacts are long-lasting but may be remediated over time.

- Medium-term: Impacts are significant but can be remediated in the medium term.

- Short-term: Impacts are short-lived and easily remediated.

- Negligible: Minimal or no lasting impacts.

This terminology was used as we felt that the strict time horizons provided by the ESRS were better suited when we have gained the experience of conducting a double materiality assessment. A more qualitative approach was found to be better suited for the first iteration of the double materiality assessment.

Value chain estimations

When we estimate the greenhouse gas emissions in our value chain, we rely on sector-average data or proxies. In the case of indirect greenhouse gas emissions (scope 2 and scope 3) we rely on data such as:

- The UK government GHG conversion factors for company reporting.

- Data provided by our service provider for international travel such as flights, trains, and hotels. These values may understate our actual emissions as we may in some instances have flown using other services and data is therefore not easily retrievable.

- Location based emission factors for scope 2 emissions provided by sector average databases.

- For scope 2 GHG emissions, we often need to rely on average energy use per square meters in office buildings as we are unable to retrieve primary data from some of our offices. In such cases, we use Europe average energy use for office buildings.



Governance

Gov-1 – The role of the administrative, management and supervisory bodies

Composition of the administrative, management and supervisory bodies, their roles and responsibilities and access to expertise and skills with regard to sustainability matters.

The composition and diversity of the administrative, management and supervisory bodies.

- The gender composition of Creditinfo group board is as follows:

Gender	Number of board members
Male	9
Female	0

The board has access to an internal sustainability expert with Ph.D. level expertise in Environmental Science.

Information about the composition and diversity of the members of the undertaking's administrative, management and supervisory bodies

The number of executive and non-executive members.

The gender composition in the C-suite of Creditinfo group is as follows:

Gender	Number of C-suite members
Male	5
Female	3

The percentage of independent board members.

None of Creditinfo Groups board members are independent. However, some of the local boards in the countries we operate do have independent directors.

Strategy

SBM-1 – Strategy, business model and value chain

I. Creditinfo is a service provider in the field of credit information, risk management solutions and other business information. We operate in more than 25 countries, over 4 continents in some form. Creditinfo was founded in 1997 in Iceland but has grown to a global company since then. We provide credit reports, monitoring services, business information services, automated decisionmaking systems, risk management consulting and ESG data. Our products are designed to improve financial inclusion and economic growth by enabling more accurate and efficient credit decisioning for lenders, governments, and central banks worldwide.

II. The significant markets and groups we serve are:



- a) Financial institutions such as banks, credit unions and MFI's.
- b) Businesses of various types, but mainly those who provide credit or require credit assessments.
- c) Governments and central banks who we provide with credit and risk management solutions.
- d) Individuals who can monitor their credit profiles.

III. We employ a diverse and talented group of individuals. Most of our operations are in Czech Republic, Iceland, Lithuania, Estonia, Uganda, West Africa, Morocco, Kenya, Latvia, Tanzania, Malta and the United Kingdom. A breakdown of our headcount per gender and location can be seen in the section covering ESRS S1-6.

SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model

The results from the materiality assessment show which sustainability factors are most likely to impact our operations.

Those are:

Climate change mitigation

Changing climate is already having profound impacts on economies world-wide. Negative environmental impacts on economies may affect our revenue potential in case there will be less credit issued in those markets. We operate in various markets where the impact from climate change varies. We monitor the developments and adjust our operations as needed, such as with new product offerings related to climate change mitigation.

Working conditions

The working conditions in the markets we operate within can be a risk factor. We for instance operate in Ukraine, where our operations were disrupted due to the war.

For variables we can control, such as in-house working conditions, we aim to provide first class facilities which go beyond minimum expectations.

Equal treatment and opportunities

Internally we have several policies which we follow regarding equal pay and opportunities for all. In the economies we operate, we are also exposed to risks if equality is not present. Such risks materialize in lower credit being issued to an excluded group of people. Equality therefore benefits our operations greatly.

Other work related rights

Creditinfo is a knowledge driven company, where the knowledge resides within our employees. We are committed to follow local regulations fully regarding the rights our employees have.

Information-related impacts for consumers and/or end-users

The data we generate and provide is intended to improve decision making in the financial sector. We however run a risk of impacting consumers and/or end-users if providing inaccurate data. To compensate for this we have strong measures in place to verify data which may have such impacts. We also maintain strong appropriate controls to mitigate data leaks as such an event would impact consumers privacy.

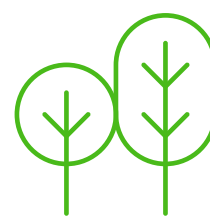
Social inclusion of consumers and/or end-users.

As is with equal opportunities for all, social inclusion in the markets we operate within is of importance to our operations.

Corporate culture

Corruption and bribery

Protection of whistleblowers





Impact, risk and opportunity management

IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities

Double materiality assessment

Methodology

For the 2023 sustainability statement we conducted our first attempt at a double materiality assessment. This was done to understand which sustainability factors should be included in this sustainability statement and what information would provide valuable to our stakeholders. Double materiality assesses the two dimensions impact can be viewed from our operations.

1. The impact our operations have on the economy, society and the environment.
2. The impact the economy, society and the environment have on our operations.

This process is conducted to better understand our impact and reflect on those impacts in the sustainability statement. This will make the data presented in this statement more relevant to the company and useful for stakeholders.

Stakeholders and their relevance to the materiality assessment process

We are taking a phase-in approach for our double materiality assessment. For this year, we engaged with the management team covering most markets Creditinfo operates in. We believe this will provide us with reasonable good and clear results in our double materiality assessment. It is our intention to expand our scope to other stakeholders in the upcoming sustainability statements. Expanding the scope of stakeholders may change the outcome of the assessment process, resulting in different indicators to be reported on in the upcoming sustainability statements.

Double materiality results

In *Figure 1*, the results from the materiality assessment is plotted. The dots plotted have been considered material by a part of the management team globally. However, only those factors who are considered informative, important or significant, i.e. have a higher score than 5 on either the impact materiality or financial materiality scale, are considered material and reported on in this statement. A list of material sub-topics can be seen in *Table 1*, and visually in more detail in *Figure 1*.

Table 1. A list of ESRS sub-topics considered material in this statement

ESRS topic #	ESRS sub-topic	Financial materiality category	Impact materiality category
E1	Climate change mitigation	Minimal	Informative
S1	Working conditions	Minimal	Informative
S1	Equal treatment and opportunities for all	Minimal	Informative
S1	Other work-related rights	Minimal	Informative
S4	Information-related impacts for consumers and/or end-users	Minimal	Important
S4	Social inclusion of consumers and/or end-users	Minimal	Informative
G1	Corporate culture I	Informative	Informative
G1	Corruption and bribery	Minimal	Informative
G1	Protection of whistleblowers	Minimal	Informative

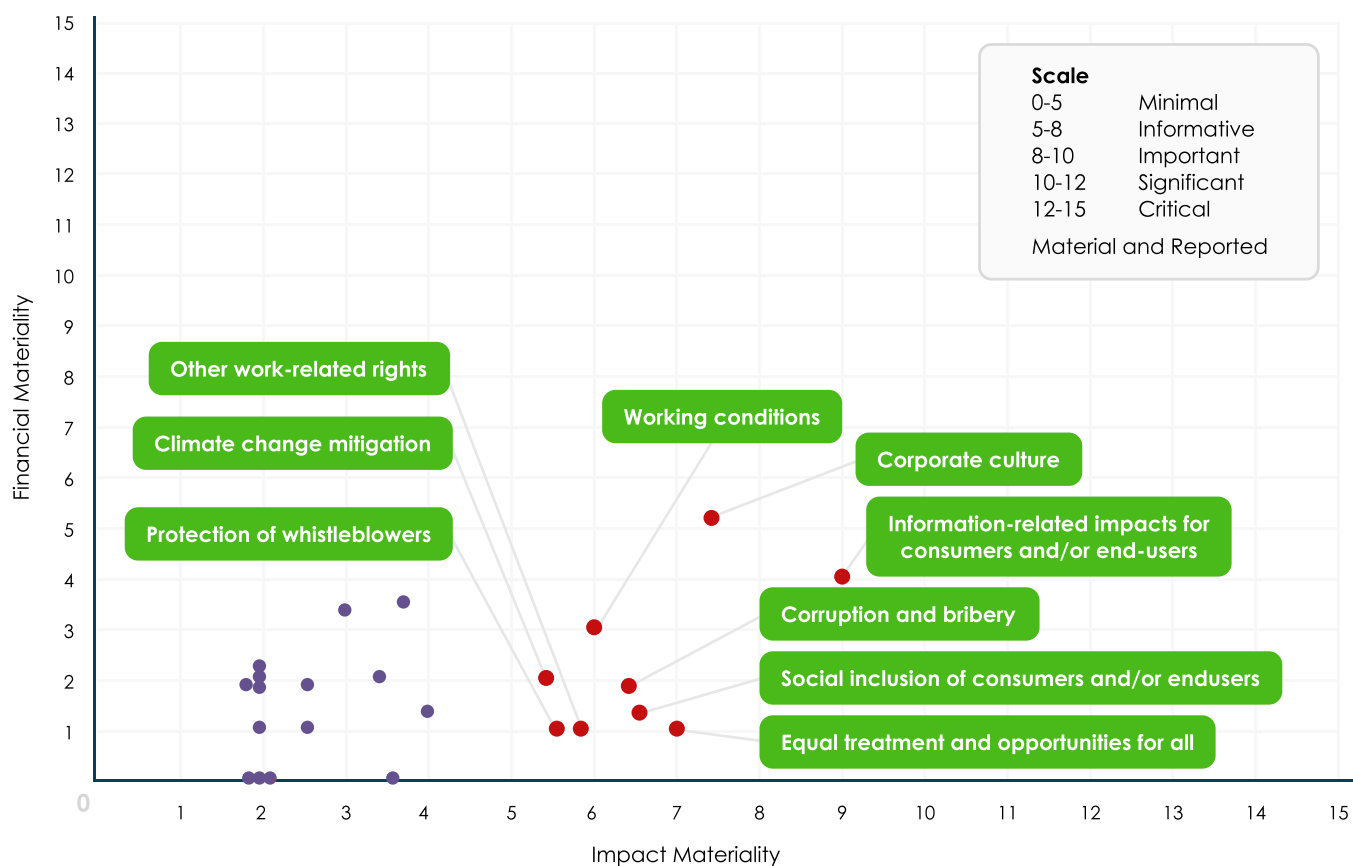


Figure 1. A plot of sub-topics considered material



Metrics and targets

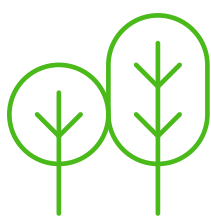
MDR-P – Policies adopted to manage material sustainability matters

Our policies can be found at www.creditinfo.com/policies

Policy	Material sustainability matter covered
Code of conduct policy	Other work-related rights Working conditions Corporate culture Corruption and bribery Social inclusion of consumers and/or end-users
Sustainability policy	Climate change mitigation Other work-related rights Equal treatment and opportunities for all
Information security policy	Information-related impacts for consumers and/or end-users
Whistleblower policy	Protection of whistleblowers
Anti-bribery & Anti-corruption policy	Corruption and bribery
Anti-money laundering and sanctions policy	Corruption and bribery

MDR-A – Actions and resources in relation to material sustainability matters

Material sustainability matter	Actions and Resources
Protection of whistleblowers	<p>Creditinfo published its first suite of compliance policies including a whistleblower policy in 2019.</p> <p>The policy assists and educates Creditinfo Group employees on what to do in order to report concerns or suspected misconduct within the organisation. The policy implements a reporting line to the Group compliance department via e-mail so that employees and other stakeholders can blow the whistle in confidence and without fear of retaliation.</p> <p>Creditinfo local companies are able to expand upon the principles laid down in the group policy. The policy is up for review during FY 2024, where it will be assessed whether its contents continue to align with our evolving group structure. The Group also plans to implement by end of FY2024 an anonymous whistleblowing line.</p> <p>The Group provides regular training to its employees on its compliance policies.</p>



Material sustainability matter

Climate change mitigation

Actions and Resources

- At this point in time our focus has been on streamlining our greenhouse gas emissions accounting.
- Scope 1, 2 and 3 emissions have decreased by 39%, 1% and 38% from previous year respectively.
- We have not set targets regarding our greenhouse gas emissions.
- We are aware that climate change impacts the economies we operate in. The change in weather patterns for example may lead to failed crops and other financial impacts within the general public and companies located within the economies we operate. Such impacts stemming from climate change may, in the long run, impact the financial performance of Creditinfo.
- We help our clients understand their sustainability risks. This we do for example by providing specialized software solutions, such as our ESG data platform which has been fully deployed in Iceland. We are currently investigating the deployment of the software solution in other markets.

Other work-related rights

Creditinfo's code of conduct states as follows: The Group is committed to a working environment that promotes diversity and equal opportunity and where there is mutual trust, respect for human rights, and no discrimination.

We will recruit, employ, and promote employees on the sole basis of the qualifications and abilities needed for the work to be performed.

We are committed to safe and healthy working conditions for all employees.

We will provide employees with a total remuneration package that meets or exceeds the legal minimum standards or appropriate prevailing industry standards.
We will not use any form of forced, compulsory, trafficked, or child labour.

We are committed to working with employees to develop and enhance each individual's skills and capabilities.
We respect the dignity of the individual and the right of employees to freedom of association and collective bargaining.

We will maintain good communications with employees through company based information and consultation procedures.

We will ensure transparent, fair and confidential procedures for employees to raise concerns.



Material sustainability matter

Working conditions**Actions and Resources**

Across Creditinfo Group, our working conditions are managed in line with local labor laws. The Group People Strategy aims at aligning our group towards one Creditinfo, with a view to implement Group Policies, Networking groups, Development and other HR practices to support equity, inclusion & consistency. Many of our bureau's offer the opportunity between office and working from home, to help support a better work-life balance.

Corporate culture

Our People Functions mission is to enable the business to champion Financial Inclusion, whilst we all strive to create culture where everyone feels engaged, valued and supported. We're working towards being One Creditinfo.

During the next 3 years, we have plans to ensure all employees understand our purpose as a Group and align their goals towards this, supporting us in championing financial inclusivity. We celebrate our successes globally through our values award program, recognizes those who have gone above and beyond with our values; Respect, Innovation and Non Nonsense. We have incentives to recognize those high performing in our Sales Function.

We have employee surveys measuring well-being and eNPS, and have plans across the Group to understand the results & feedback of our employees to implement local practices to improve these scores, working towards a happy and engaged workforce.

We're investing in a new functional role for Learning & Development, to support across the Group and implement core development programs for our Managers and Leaders, as well as looking at ways we can further support career growth, with ambitions to build career pathways to enable our employees to navigate ways the can continue to grow their career.

We've launched this year a Network Resourcing Group for Women, this has been designed to promote gender equality, support career development, advocacy for women, and foster meaningful networking opportunities across our Group.

We have champions for Women at Creditinfo in some countries with an ambition to have more advocates during 2024.

We plan to launch a Networking \group for DE&I, showcasing our dedication to Diversity, Equity and Inclusion across the globe, and provide a platform for our employees to have a voice and work towards equal opportunities for our employees.

Information-related impacts for consumers and/or end-users

Creditinfo has a fundamental responsibility towards consumers and society as a whole to be reliable caretakers of personal information.

Data is held onshore as required by regulators, or otherwise in regional data centers as allowed under local regulations. Data can only be accessed through the interface, with strict user access controls.





Material sustainability matter

**Information-related impacts
for consumers and/or end-
users**

Actions and Resources

Independent third-party security audits are performed annually on Creditinfo's core credit bureau system. Creditinfo's Infosec standards are globally managed by a CISO based in our IT hub in Prague.

The Group is ISO27001 certified.

Creditinfo operates subject to data protection laws and regulations whether locally or regional such as the EU GDPR, with strict surveillance and subject to regular controls from data protection regulators. Local data protection officers are appointed where relevant with oversight from global legal & compliance function.

Corruption and bribery

Creditinfo has undertaken an assessment of corruption and bribery risks throughout its organisation and accordingly adopted a global anti-bribery and anti-corruption policy which puts in place controls and measures to mitigate related risks. Training is provided on an ongoing basis and central and local legal & compliance functions take ownership over the enforcement of the policy.

Local policies may expand on the global policy where necessary.

**Social inclusion of
consumers and/or end-
users**

Providing access to finance and improve social inclusion is the core of the company operations. A single action does not describe how we approach this topic, but rather that our day-to-day business aims to improve social inclusion in the markets we operate in all aspects.

**Equal treatment and
opportunities for all**

At Creditinfo group we strive to ensure Equal Opportunities for all, we are working towards implementing a full suite of policies across the Group and expect this to be in place during 2025. We have plans during 2024 to launch a networking Group for DE&I, to ensure equal opportunities and voice across the Group. We've recently launched an open forum with the Global head of HR, called Let's Talk aimed at fostering open and transparent communication across the Group. We're proud our Iceland Bureau received Equal Pay Certification in 2022.

» ESRS 2 – Topical Disclosures

Environment

E1 – Climate Change

ESRS Sub-topics:

- Climate change mitigation

Strategy

ESRS 2 SBM-3

The undertaking shall explain for each material climate-related risk it has identified, whether the entity considers the risk to be a climate-related physical risk or climate-related transition risk.

Material impacts, risks and opportunities and their interaction with strategy and business model

Transition climate risk

The business of Creditinfo is to provide valuable insights into the economy. Climate change can indirectly impact our operations. The transition to a low carbon economy mostly favours our business. This can be seen in more requests for sustainability related data and is currently reflected in our product offering.

Physical climate risk

The physical climate risk can negatively impact our operations in certain geographical areas. The reason behind the possible negative impact is the impact on the economy climate change has. This impact can result in decline in economic growth, less credit being issued and less need for our services. We are aware of such risks and follow the developments closely in all our markets.

Impact, risk and opportunity management

ESRS 2 IRO-1

Description of process in relation to climate-related physical risks in own operations and along value chain

Description of the processes to identify and assess material climate-related impacts, risks and opportunities

Physical climate risks are not considered material to our own operations directly. Physical climate risks may impact us indirectly through the operations of our IT service providers.

When looking at opportunities, we understand that climate risks are being evaluated by our customers in great depth. We have addressed this in our product offering where we have released a sustainability focused data platform in Iceland. The sustainability platform we aim to expand to other markets we operate within.



E1-2

Policies in place to manage its material impacts, risks and opportunities related to climate change mitigation and adaptation

Policies related to climate change mitigation and adaptation

Sustainability matters addressed by policy for climate change

Creditinfo has implemented a comprehensive Sustainability policy. The policy in whole is published along with other policies externally on www.creditinfo.com/policies.

The sustainability policy directs our actions regarding:

Policies related to climate change mitigation and adaptation

- Environmental impact of operations
- Data security
- Diversity, equity & inclusion
- Employee engagement
- Integrity, ethics & compliance
- Sustainable products and services

As shown in the list above, we monitor the environmental impact of our operations. This includes measuring and monitoring our direct and indirect GHG emissions, while also set, monitor and achieve scientifically sound reduction targets. Regarding targets, we have yet to begin the process of setting targets as we are still in the process of understanding our GHG emissions.

E1-3

Achieved GHG emission reductions

Actions and resources in relation to climate change policies

As we are still in the process of understanding our Scope 3 emissions, our reductions can only be reasonably be compared in Scope 1. Between the years 2022 and 2023, our Scope 1 emissions have been reduced by 39%. This metric will be further elaborated on as we have set a sound reduction target.

	2022	2023	ChangeYoY
Scope 1 (tCO ₂ e)	26	16	-39%
Scope 2 (tCO ₂ e)	136	134	-1%
Scope 3 (tCO ₂ e)	290	180	-38%

Metrics and targets / Total energy consumption related to own operations

E1-5

Total energy consumption related to own operations

Energy consumption and mix

For energy consumption we report on electricity use for the offices we use. Note that for previous years, and in some cases for the year 2023, estimations are used to account for electricity use in certain regions. This is done to give a more realistic view of the electricity use even though we may not have access to data in some regions. As of now, we do not have data of specific energy grid mixes in all the regions we operate in.

	2020	2021	2022	2023
KWH	664,332	548,881	518,694	426,707



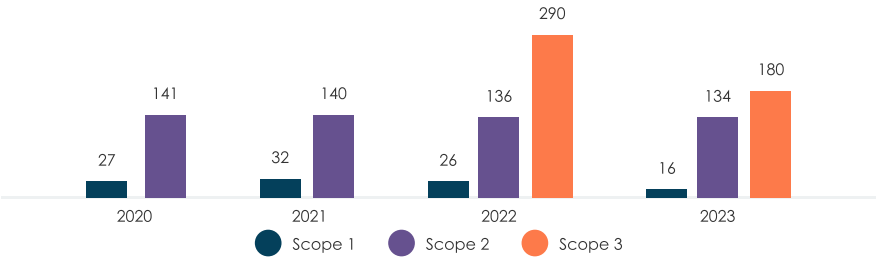


E1-6

Gross Scopes 1, 2, 3 and Total GHG emissions - GHG emissions per scope

Gross Scopes 1, 2, 3 and
Total GHG emissions

	2022	2023	ChangeYoY
Scope 1 (tCO ₂ e)	26	16	-39%
Scope 2 (tCO ₂ e)	136	134	-1%
Scope 3 (tCO ₂ e)	290	180	-38%



Disclosure of methodologies, significant assumptions and emissions factors used to calculate or measure GHG emissions

Emission factors

For **Scope 1** we gather data on the purchase of fuel and kilometres driven of company owned vehicles. This is then converted to CO₂e by using emission factors provided by the UK Government emission conversion factors.

For **Scope 2** we only account for location based emissions. For some regions we only have data for the most recent year. In such cases, we assume that the current year is representative for the previous years we report on. In cases where we do not have data on electricity use, we use the European average of 161 kWh/m² ¹. To estimate the location based emissions we use data from the OECD and other third party databases ².

For **Scope 3**, we retrieve emission data from TravelPerk (Flights, Hotels, Trains and rental cars) and emission data for cloud computing from Microsoft.

¹. <https://www.odyssee-mure.eu/publications/efficiency-by-sector/services/offices-specific-energy-and-electricity-consumption.html>
². Scope 2 emission factors for African countries retrieved from www.lowcarbonpower.org

Social

» Statement from our Head of Human Resources



At Creditinfo Group, we believe our people are at the heart of what we do. We champion financial inclusivity, and are committed in our mission to create a culture where everyone feels engaged, valued, and supported. As the Group Head of Human Resources, I am excited to share how our HR initiatives contribute to a thriving and innovative workplace.

Our ambition is to create an inclusive environment, where employees feel engaged and happy.

We're truly a Great Place to Work. Our ongoing efforts to measure engagement and implement action plans ensure that every team member feels heard and valued.

We're committed to fostering an inclusive environment with an open dialogue, and have recently launched an open forum for employees to engage directly with the Group Head of HR "Let's Talk". This initiative provides a platform for employees to share their ideas, concerns, and feedback, ensuring that our HR strategies are responsive to the needs of our employees.

We've recently launched a networking Group (NRG), Women at Creditinfo exemplify our dedication to fostering diversity and creating a supportive community across the Group. The group is designed promote gender equality, support career development, advocacy, and fostering meaningful networking opportunities for all employees, with a particular focus on women.



We have future plans to launch a dedicated NRG for Diversity, Equity and Inclusion, to support us in fostering a culture of belonging. The focus within the NRG's will be to hear feedback, create meaningful change and implement policies, tools and training to promote DE&I across our Group.

We celebrate the success of our employees through our values award programme 'Applause for Employees'. This program recognises our employees who exemplify Creditinfo Values, Respect, No Nonsense & Innovation. We have Leadership awards recognising our talented leaders across the Group, showcasing the great achievements of our employees globally.

We recognise the need to ensure our employees have development plans, to grow personally and professionally, and have plans over the next 12-18 months to launch a Creditinfo Academy. The intention is to equip our employees with the skills and knowledge needed to drive innovation and further develop their skills personally and professionally. We recognise there is still more work to be done, and remain committed to the development of our employees.

Emma Redfern
Global Human Resources Lead
- Creditinfo Group



S1 – Own workforce

ESRS Sub-topics:

- Working conditions
- Equal treatment and opportunities for all
- Other work-related rights

Impact, risk and opportunity management

S1-1

Policies to manage material impacts, risks and opportunities related to own workforce, including for specific groups within workforce or all own workforce

Policies related to own workforce

Creditinfo Group has 27 entities across the globe, some entities have policies and procedures to support employees. We have plans to build central Group Policies, to ensure consistency across the Group.

Disclosure of general approach in relation to engagement with people in its own workforce

We measure eNPS every 6 months, and have improved our score across the Group to +14. We're committed to understand ways Creditinfo Group can improve employee engagement, supporting this in building action plans across our Group to identify steps we can take to improve engagement.

Specific policies aimed at elimination of discrimination are in place

We believe that a diverse and inclusive workforce is fundamental to our sustainability and success. Although we are still in the process of formalising specific policies aimed at eliminating discrimination, we are committed to fostering a culture where every employee feels valued, respected, and empowered. We support NRGs, such as our Women's Network Resource Group, which provide platforms for employees to connect, share experiences, and advocate for positive change and have plans to implement an NRG to focus on DE&I.

S1-2

Disclosure of whether and how perspectives of own workforce inform decisions or activities aimed at managing actual and potential impacts

Processes for engaging with own workers and workers' representatives about impacts

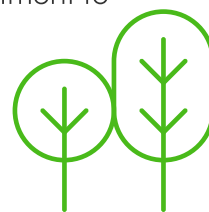
At Creditinfo Group we ensure we follow local labour laws to inform on managing actual or potential impacts.

Disclosure of stage at which engagement occurs, type of engagement and frequency of engagement

We measure eNPS every 6 months.

Disclosure of function and most senior role within undertaking that has operational responsibility for ensuring that engagement happens and that results inform undertakings approach.

HR Function is responsible for ensuring engagement happens, with regional leaders being accountable for the commitment to engagement and action plans.



Processes for engaging with own workers and workers' representatives about impacts

Disclosure of function and most senior role within undertaking that has operational responsibility for ensuring that engagement happens and that results inform undertakings approach.

HR Function is responsible for ensuring engagement happens, with regional leaders being accountable for the commitment to engagement and action plans.

S1-3

Disclosure of general approach to and processes for providing or contributing to remedy where undertaking has caused or contributed to a material negative impact on people in its own workforce

Processes to remediate negative impacts and channels for own workers to raise concerns

We've recently launched a Lets Talk session with the Group Head of HR to support an open and inclusive environment for our employees, it's a mechanism for employees to share feedback. We recognise there is more work to do here and are committed to implementing Group Policies aimed at ensuring employees have a mechanism to raise concerns.

Grievance or complaints handling mechanisms related to employee matters exist.

Across the Group we follow local labour laws to ensure any grievance or complaints are managed accordingly.

S1-4

Description of action taken, planned or underway to prevent or mitigate negative impacts on own workforce.

Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions

At Creditinfo Group we ensure we follow local labour laws to inform on managing actual or potential impacts.

Description of additional initiatives or actions with primary purpose of delivering positive impacts for own workforce

Our People Strategy is aimed at creating a Happy and Inclusive place for all employees globally, we have launched an NRG for Women and have plans to implement one for DE&I during 2024. We have an open forum with the Group Head of HR, called Lets Talk, aimed at fostering an open dialogue and inclusive culture. We run well-being surveys and eNPS which allows anonymous feedback from our employees. Results are reviewed and action plans are implemented to address employees voice.

Metrics and targets

S1-5

Targets set to manage material impacts, risks and opportunities related to own workforce

Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

We have a target to increase our eNPS over the next 3 years to +50, and measure our attrition across the group with a yearly target of <10%. We're committed to ensuring all our employees have meaningful goals and have plans to measure the effectiveness.

Metrics and targets

S1-5

Targets set to manage material impacts, risks and opportunities related to own workforce

Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

We have a target to increase our eNPS over the next 3 years to +50, and measure our attrition across the group with a yearly target of <10%. We're committed to ensuring all our employees have meaningful goals and have plans to measure the effectiveness.

S1-6

Characteristics of the undertaking's employees

Number of employees (head count or full-time equivalent)

Number of employees as of June 2024 - **409**

Average number of employees (head count or full-time equivalent)

Last 12 months average headcount - **414**

Percentage of employee turnover

For the period June 2023 – June 2024 turnover - **8.4%**

Description of methodologies and assumptions used to compile data (employees)

Number of employees who left / Average total employee count * **100**

Employees numbers are reported in head count or full-time equivalent

Numbers reported in headcount

Further detailed breakdown by gender and by region:

	Female	Male
Czech Republic	23	67
Estonia	18	20
Oman	2	4
Indonesia		3
Kenya	10	12
Iceland	21	25
Latvia	6	9
Lithuania	23	20
Malta	4	7
Morocco	16	12
Monaco	1	4
Namibia	1	1
Slovakia		2
Tanzania	5	8
Uganda	21	13
UK Ltd	2	3
Ukraine	5	3
West Africa	12	17
Malta	2	
Total	172	230

S1-9

Diversity metrics

Number of employees (head count) at top management level

45

Percentage of employees at top management level

11%

Number of employees (head count) under 30 years old

54

Percentage of employees under 30 years old

15%

Number of employees (head count) between 30 and 50 years old

278

Percentage of employees between 30 and 50 years old

74%

Number of employees (head count) over 50 years old

42

Percentage of employees over 50 years old

11%

Disclosure of own definition of top management used
Group & Market Executive team + - 1

S1-10

All employees are paid adequate wage, in line with applicable benchmark

Adequate wages

Employees are paid in line with local labour laws

S1-13

Average number of training hours per person for employees

**Training and skills
development metrics**

We are introducing a dedicated Head of Learning & Development to build out development needs across the Group and develop key metrics.

S1-17

Number of incidents of discrimination

**Incidents, complaints and
severe human rights
impacts**

None known at the group level.



S4 – Consumers and end-users

ESRS Sub-topics:

- Information-related impact for consumers and/or end users
- Social inclusion of consumers and/or end-users

Strategy

ESRS 2 SBM-3

All consumers and end-users who can be materially impacted by undertaking are included in scope of disclosure under ESRS 2

Material impacts, risks and opportunities and their interaction with strategy and business model

Description of types of consumers and end-users subject to material impacts

Consumers that have created an account with Creditinfo or used one of our subscriptions Consumers that have a bank or credit account with a lender or other financial provider Consumers who have direct contact with one of our data partners and have been given notice of such transfer Consumers registered in publicly available sources, including the government, local authorities and other public bodies.

Description of activities that result in positive impacts and types of consumers and end-users that are positively affected or could be positively affected

The processing of consumer personal data for the provision of reliable information on creditworthiness has positive impacts on consumer and end-users such as (i) the prevention of over-indebtedness, (ii) the accuracy and security of the processed personal data which is subject to strict care and security standards of an internationally known credit bureau group, (iii) the facilitation of access to finance and, (iv) the prevention of fraud.

Description of material risks and opportunities arising from impacts and dependencies on consumers and endusers

Credit bureaus manage a wealth of financial information on individuals and entities which if mismanaged can have a major negative impact on consumers, including the possibility of data breaches or the inaccuracy of information relayed to financial institutions or other financial stakeholders.

Impact, risk and opportunity management

S4-1

Policies to manage material impacts, risks and opportunities related to consumers and end-users.

Policies related to consumers and endusers

Policies to manage material impacts, risks and opportunities related to affected communities, including specific groups or all consumers / end-users.

Creditinfo Group has global information security policies as well as local privacy policies which are adapted to the specific personal data processing activities of each group company. Creditinfo bureaus also operate under strict laws, regulations and surveillance from Central Banks, financial supervision authorities and data protection authorities relating to credit referencing activity and data protection.

Description of relevant human rights policy commitments relevant to consumers and/or end-users.

Creditinfo's Sustainability policy states as follows: We rely on sensitive financial and personal data for our services. Keeping this data secure and uncompromised is of utmost importance to our operations and reputation. Therefore, we have developed a standalone Information security policy that guides our data storage operations. In addition, we closely monitor any abnormalities regarding our data and its usage, such as data breaches and customers affected. Furthermore, we go through multiple independent audits each year, providing valuable feedback for continuous process improvements. Our approach about data security is outlined in detail in our Data security policy. Creditinfo's Code of Conduct states as follows: Creditinfo companies are committed to providing credit information and risk management products, services, and solutions to facilitate access to finance in both developed and emerging markets. Our products, services, and solutions consistently offer value in terms of price and quality.

In order to maintain high business standards, we furthermore carry out know-your-customer checks in accordance with the Group's Know-Your-Customer Policy. The Group is committed to establishing mutually beneficial relations with our suppliers, customers, and business partners. In our business dealings, we expect our partners to adhere to business principles consistent with our own.

In order to maintain high business standards, we carry out know-your-supplier checks in accordance with the Group's Know-Your-Supplier Policy, and where applicable the selection process of suppliers is also conducted line with the Group's Procurement Policy.

S4-2

Disclosure of how perspectives of consumers and end-users inform decisions or activities aimed at managing actual and potential impacts

Processes for engaging with consumers and endusers about impacts

Creditinfo has customer service lines and customer dispute channels available in each of its subsidiaries which include attention in office, by telephone, by e-mail or through web/mobile applications. Creditinfo has available privacy policies for each of its group companies in local language and easily accessible to consumers and end-users. Data Subjects have the possibility and are informed through different channels of how they can get in touch with Creditinfo to ask questions about their data, object to its processing or exercise other privacy rights.

Consumers are also able through different channels such as subscription based applications to supplement information that Creditinfo stores and therefore have more control over matters such as credit score.

S4-4

Disclosure of general approach to and processes for providing or contributing to remedy where undertaking has identified that it connected with a material negative impact on consumers and end-users

Taking action on material impacts on consumers and endusers, and approaches to managing material risks and pursuing material opportunities related to consumers and endusers, and effectiveness of those actions

Creditinfo has different procedures available so that consumers can in a timely manner point out any inaccuracy or correction required with respect to their data so that any negative impact is mitigated.

Disclosure of specific channels in place for consumers and end-users to raise concerns or needs directly with undertaking and have them addressed.

Creditinfo has customer service lines and customer dispute channels available in each of its subsidiaries which include attention in office, by telephone, by e-mail or through web/mobile applications.

Governance

G1 – Business conduct

ESRS Sub-topics:

- Corporate culture
- Corruption and bribery
- Protection of whistleblowers

ESRS 2 GOV-1

Disclosure of expertise of administrative, management and supervisory bodies on business conduct ESRS 2 GOV-1 matters



The role of the administrative, supervisory and management bodies

The group operates under a set of global policies that ensure its ethical, legal, and professional standards. These policies include a code of conduct, core compliance policies, information security, and sustainability. The highest governing body of the group is the board of directors, which consists of executive and non-executive directors who represent the shareholders of Creditinfo. The board is supported by central finance, legal, and compliance control functions that oversee the group's operations and performance. The board is also informed by the group's director of sustainability on any related matters. The board is kept abreast of Creditinfo's core sustainability challenges and remediation plans as well as receives an annual external evaluation of the group's ESG maturity levels. Each group company has a local board that also includes executive and non-executive directors who report to the central control functions and the group board. In some countries, where the local legislation requires, some group companies have a two-level board structure, composed of a management board and a supervisory board of directors. This governance structure ensures that Creditinfo Group maintains its vision, mission, and values across all its markets and stakeholders.

Impact, risk and opportunity management

G1-3

Information about procedures in place to prevent, detect, and address allegations or incidents of corruption or bribery

Prevention and detection of corruption and bribery

Creditinfo's Anti-bribery and anti-corruption policy sets forth a framework to address potential areas of risk for the business in this area, including how to engage with higher risk third parties as defined in the policy as well as approach to gifts and hospitality. It defines the key requirements and obligations with respect to handling (i) interactions with public officials, (ii) role of gifts and hospitality in relation to Creditinfo's commitment to doing business with integrity, (iii) policies and procedures regarding any authorised payment of Per diems, (iv) prohibition of facilitation payments and guidance to help identify risk situations, (v) due diligence of higher risk third parties such as external sales agents, and (vi) policy and procedure regarding charitable contributions as well as prohibition of political contributions

Metrics and targets

G1-4

Incidents of corruption or bribery and resources to manage its material impacts, risks, and opportunities related to consumers and end-users [see ESRS 2 - MDR-A]

Confirmed incidents of corruption or bribery

0

G1-5

Information about representative(s) responsible in administrative, management and supervisory bodies for oversight of political influence and lobbying activities





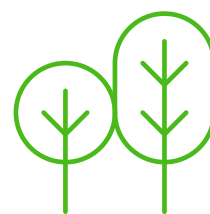
Political influence and lobbying activities

Creditinfo has not engaged external representatives for oversight of political influence and lobbying activities during the reporting period. Any activity which is linked to interactions with public officials including participation in consultations regarding laws and regulations is managed internally by its management members in accordance with the Group's compliance policies.

Disclosure of main topics covered by lobbying activities and undertaking's main positions on these topics

Political contributions are forbidden in accordance with the Group's compliance policies.

The main topics covered are laws and regulations applicable to Creditinfo as a credit referencing agency subject to licenses issued by public authorities such as Central Banks or Data Protection authorities. Creditinfo participates in public consultations regarding draft regulations that could affect its business or participates in public policy discussions to which it is invited to comment on as private sector representative.





Thank you

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