

ENVIRONMENTAL, SOCIAL, AND GOVERNANCE (ESG) POLICY

Responsible department: *Legal & Compliance*

Approved by: *Board of Directors*

DOCUMENT LOG

Date	Version	Section	Change	Made by
2021-01-11	1.0	All	First version	CEO
2024-10-02	1.1	All	Minor updates and design	CEO/HV

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1 Introduction

- 1.1 Flex Funding A/S (hereinafter referred to as the "Flex Funding" or the "Company") matches at the online marketplace the investors (private and professionals) who wants to lend and earn great rates at low costs, with established business who want affordable loans within reasonable time, at competitive prices, and with minimum trouble.
- 1.2 The environmental, social and corporate governance (ESG) concerns are now becoming increasingly important in the financial market.
- 1.3 The unsustainable environmental practice of conduct may lead to financial penalties, compromised reputation and negative implications for progress.
- 1.4 The inappropriate labor practices or human rights violations may put companies at risk of disruptions, impairing economic growth.
- 1.5 The insufficient governance may promote an environment that ignores customer rights and interests while enabling fraud or corruption and increasing risks.
- 1.6 The Company recognizes that the inclusion of ESG factors is necessary for a complete understanding of risks and opportunities of operating the Company.
- 1.7 The main purpose of this policy is to confirm Company's commitment in ESG area.
- 1.8 This policy defines also the responsibilities in the process of incorporating ESG factors in Company's decisions and operations as well as the reporting and policy review rules.

2 Scope

- 2.1 This policy applies to Flex Funding A/S and all its subsidiaries in all geographic regions they operate.

3 Responsibilities

- 3.1 The Board of Directors is responsible for:
 - defining the ESG standards by adoption of this policy and its updates;
 - consideration of the CEO's reports on issues related to ESG issues;
- 3.2 CEO is responsible for:
 - implementing this policy in FF;
 - ensuring that employees are familiar with this policy;
 - monitoring the implementation of the policy;
 - reporting to the Board of Directors on ESG issues including the engagement results ;
 - ensuring that the policy is kept up to date;
 - updating this policy and presenting updated versions to the Board of Directors;
 - adopting relevant business procedures if necessary;
- 3.3 ESG Team consisting of the CEO and the CRO is responsible for:
 - conducting ESG analysis and engagement activities;
 - preparing the draft business procedures;
 - reporting to the CEO.

- 3.4 Employees are responsible for ensuring that the policy and the related business procedures and work instructions are followed in connection with their daily work.

4 Commitment

- 4.1 Flex Funding acknowledges that its business activities affect the society and environment around, and that Flex Funding has an opportunity ensure this impact is positive.
- 4.2 Flex Funding also believes that sustainable and efficient operations is a basis for long-term value creation.
- 4.3 Therefore Flex Funding will seek to act at all times as a responsible company promoting appropriate environmental, labor and human rights and ethical standards, as well as promoting gender equality, by incorporating ESG factors in its decisions and operations.

5 Trainings

- 5.1 The policy commitments must be communicated to the Company's staff through training organized by the CEO.
- 5.2 The training should be repeated when policy or circumstances change.

6 Reporting

- 6.1 The CEO must on an ongoing basis report to the Board of Directors regarding:
- Company engagement results;
 - breaches of the policy, including the actions taken as a result of the breach;
 - need to update this policy.

7 Review

- 7.1 In order to ensure that the policy is effective and sufficient, the policy must be reviewed and approved with appropriate frequency and at least once a year by the Board of Directors and, if necessary, be adjusted.

8 Signing

Adopted by the Board of Directors on 16. October 2024.

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