

## Human Rights Statement

Our mission is to build the place where small businesses get the funding they need to win. In delivering this mission we want to have a positive impact in our communities and on the environment. We do this through the business finance we provide to our SME customers and investment opportunities for our institutional investors on the platform, as well as through sound and responsible Environmental, Social and Governance (ESG) practices that are key to achieving our mission and strategic objectives - including in respect of human rights.

Our values – Obsess over the customer, Make it happen, Think smart, Live the adventure, Stand together, and Be open – represent how we do things at Funding Circle. These values enable us to push for more. They are how we challenge ourselves, and how we hold ourselves and each other to account, as we achieve our mission.

We have assessed our business to identify human rights issues that may relate to our business. We respect, support and promote human rights including through our employment policies and practices, our approach to diversity, equity and inclusion, our supplier assurance and procurement policies, our risk and compliance policies, our customer policies, and our voluntary commitments. We will continue to develop our approach to human rights through regular assessments, ongoing due diligence and monitoring of our business practices and activities.

At Funding Circle, we believe that an open and strong culture encourages ethical behaviour and professional conduct. Funding Circle is dedicated to implementing and maintaining the highest standards of behaviour, ethics and integrity among its workforce. We promote our culture as part of our ongoing effort to reinforce our values and encourage all our employees, known as Circlers, to “Do the Right Thing” every day for our customers, employees, environment, community and other stakeholders. This includes respect for human rights. We are committed to implementing practices that support the Ten Principles of the United Nations Global Compact with respect to human rights, labour, environment and anti-corruption, and we support and promote human rights in accordance with international human rights principles encompassed by:

- United Nations (UN) Guiding Principles on Business and Human Rights
- United Nations (UN) Universal Declaration of Human Rights
- International Bill of Human Rights
- International Labour Organisation’s (ILO) Core Conventions
- OECD Guidelines for Multinational Enterprises (OECD Guidelines)

### Our employees

We’re here to build the incredible at Funding Circle. We know we can only achieve this through an inclusive and diverse culture where employees of all backgrounds feel confident in bringing their whole selves to work, where they can contribute their ideas, have opportunities to be successful, and their talents nurtured. Through empowering our people we are not only building something incredible for our customers, but an incredible place to work too.

Funding Circle is dedicated to implementing and maintaining the highest standards of behaviour, ethics and integrity among Circlers, and to creating a culture where adherence to these standards is recognised and rewarded. We are committed to a supportive work

environment, where employees have the opportunity to reach their full potential. Circlers are expected to do everything they can to create a workplace culture that is free of harassment, intimidation, bias and unlawful discrimination. Funding Circle has no tolerance for any form of discrimination. Circlers should be aware that in certain circumstances, should they be guilty of discrimination, they may be personally legally liable for their actions. For more information on our positions on diversity and non-discrimination see our Code of Conduct.

At Funding Circle, we live by our company values and know that diversity and individuality are key strengths. We ensure Circlers of all backgrounds are treated equally, and continually focus on creating an environment that welcomes, supports and provides equal opportunities to everyone, irrespective of culture, race or ethnicity, gender identity and expression, disability, marital status, age, nationality, adoption, pregnancy or maternity, religion or belief, sex or sexual orientation. We Stand Together, as one.

This policy applies to promotion, training, placement, transfer, dismissal as well as remuneration, grievance and disciplinary procedures and decisions. This policy also applies to recruitment of persons from outside the workplace and the treatment of contract workers. Our policy for the employment of people with disabilities is to provide equal opportunities with other Circlers to develop skills and secure roles relevant for them and their career ambitions. This includes making reasonable adjustments to the workplace to support this. Our recruitment process ensures all applications, including those from people with disabilities, are treated equally and fairly. We are committed to complying with all applicable labour and employment laws and ensure that all employees are aware of this Human Rights Statement.

Funding Circle champions diversity and representation. We pay all our employees at least a Living Wage, regardless of where they are located across the UK. Everyone at Funding Circle receives the same employment benefits including Parental Leave and an opportunity to participate in a share incentive plan.

For more information see our People Policy summary (People at Funding Circle).

### Our customers

Funding Circle is a finance platform, backing small businesses with the funding they need to win. SMEs are a key driver of communities, society and economies. Yet access to the finance they need to support their aspirations and operations is often restricted, with SMEs making up around half of UK GDP, but only a fraction of bank lending. For SME borrowers, Funding Circle provides a leading-edge customer experience from a trusted provider, delivered through our technology, machine learning, and data science, coupled with a supportive human touch.

### *Privacy & Digital Security*

We recognise that the correct and lawful treatment of personal data will maintain confidence in our organisation, and we are committed to protecting the personal data of the SME business owners and institutional investors who use our platform, as well as the personal data of our Circlers. Protecting the confidentiality and integrity of personal data is a critical responsibility that we take seriously at all times.

The financial services sector continues to face increasingly sophisticated cybersecurity threats. As such, Funding Circle is committed to investing in the business and technical controls to help prevent, detect and respond to cybersecurity risk. Funding Circle maintains

information security controls that are designed and implemented to protect Funding Circle customers as well as staff data, information technology assets, and reputation through the preservation of data confidentiality, data integrity and data availability. For more information, please see our Information Security and Data Protection Statements.

### *Vulnerable Customers*

Supportive customer service is a critical component of how we serve our customers, in particular our small business borrowers who face the myriad challenges of running a business and can in some cases face very real personal, professional and financial hardships. We have a dedicated business support team specifically focused on vulnerable customers. We regularly look to improve how the needs of our customers, including our vulnerable customers, are addressed, including regular review and monitoring of:

- Product design to ensure our products meet our target customers' needs;
- Price and value (i.e. costs to customers) to ensure they bear a reasonable relationship to the overall benefits the customer receives from them;
- Customer understanding to ensure that our customers are provided with appropriate information in a fair, clear and not misleading manner to help them make effective and informed decisions; and
- Customer support to ensure we provide good outcomes, for example removing any unreasonable barriers for customers to make enquiries and grievances and having appropriate processes in place for our vulnerable customers.

We regularly implement measures to support vulnerable customers, including related to our servicing practices through forbearance measures, mental health support and business advisory support.

### Our Supply Chain

We recognise the potential for procurement and supply chain practices to drive change in behaviours and outcomes in connection with various areas of sustainability. We encourage our suppliers to adhere to responsible business standards and we apply these standards when determining what suppliers we will do business with. Funding Circle is committed to social, environmental and legal ethical practices and upholds a social responsibility to meet societal obligations and expectations. For more information see our External Supplier Assurance Standard and Supplier Code of Conduct.

### Modern Slavery Statement

We have a zero-tolerance approach to modern slavery and human trafficking and we are committed to ensuring that our business operates in a socially responsible way. We are committed to playing our part in helping to improve practices designed to combat slavery and human trafficking.

We are dedicated to implementing and maintaining the highest standards of behaviour, ethics and integrity among our workforce. We have created a culture where adherence to these standards is recognised and rewarded. Employees are trained annually on our Code of Conduct, which establishes these standards and addresses subjects such as integrity, conflicts of interest and non-discrimination.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. We expect the same high

standards from all of our contractors, suppliers and other business partners. For more information see our Modern Slavery Statement.

### Remediation

We are committed to participate in or provide for reasonable, fair and equitable remediation if we identify any adverse human rights impacts caused by or resulting from our business activities. We promote access to remediation where there is a direct link to our activity or we are directly involved in those material adverse impacts through our relationships with third parties.

### Health & Safety

We care about how we operate our business and the health and wellbeing of Circlers, visitors and those who encounter our business. The Company complies with the requirements of the Health and Safety at Work Act 1974 and the associated codes of Practice. People matter and our Leadership Team is committed to promoting a proactive approach to keeping Circlers safe and preventing workplace accidents.

### Guidance and Reporting for Employees

We strive to create a workplace in which communicating with honesty is valued and respected among all employees. We are committed to comply with applicable labour and employment law and we ensure Circlers are aware of this Human Rights Statement.

*Funding Circle reserves the right to amend this Statement at any time*