



MOMENTUM

Expanding your possibilities

Environmental, Social and Governance (ESG) Policy

For Internal Use Only

Document History

Version	Year	Description	Approval Date
1.0	2020	Environmental & Social Policy	02.10.2020
2.0	2023	Environment, Social and Governance (ESG) Policy	23/08/2023

1. Introduction

This Environmental, Social and Governance (ESG) Policy provides guidelines for Momentum Credit Ltd (hereafter referred to as "The Company") relating to the Company's ESG initiatives. This includes, but is not limited to strategy, business practices, policies, process and procedures, investments, reporting, disclosures, board activities, stakeholder engagement, and investor relations. ESG is a framework for measuring, monitoring, managing, and reporting on the sustainability of a business or enterprise. The company views ESG under the broader umbrella of Sustainability, which also focuses on Impact and Corporate Social Responsibility (CSR).

1.1 Our ESG Commitment

The Company's ESG focus is centered on continuously working to minimize ESG risk and maximize ESG opportunities for the company. The company aims to achieve this through a combination of incrementally improved ESG systems and processes that align with international best practice requirements and emerging needs, while simultaneously identifying key areas for implementation of new policies, initiatives, systems, or processes.

The Company is committed to systematically assessing and improving ESG performance for financially and non-financially material ESG themes as summarized below.

1.2 Environmental

The company is committed to protecting, restoring, and conserving the natural environment for generations to come through innovative product design and development, minimizing environmental risks and maximizing the Company's positive environmental footprint. The Company will actively manage and reduce water and energy use, mitigate, reduce and offset greenhouse gas emissions, and effectively manage its waste.

1.3 Social

The Company strives to build sustainable, equitable, healthy and diverse communities and employees through a combination of innovative business practices and market leading ESG performance. The Company will actively and systematically manage and improve client protection principles, data privacy and security, employee wellbeing, employee career development, and occupational health and safety. Additionally, the company is focused on ensuring sound practices around civic engagement and giving fair compensation, gender equality, and non-discrimination.

1.4 Governance

The company is focused on developing and maintaining the highest standards of corporate governance through iterative reviews and improvements of our internal systems and processes. The company shall put in place corporate governance framework that will focus on the following key themes, namely, Board

Independence and Shareholder Rights, Anti-Competitive and Corrupt Behavior, Human Rights, Legal Compliance, Management and board Succession Planning, Transparency and Disclosure.

2. Environmental and Social Risk Management

The Company believes that serving its clients with innovative financial products and best of class customer service goes hand in hand with managing the environmental & social (E&S) implications of lending activities and risk management. E&S factors can materially influence its ability to meet its financial obligations in the long term. As a responsible corporate citizen, the company is convinced that economic performance is closely linked to respecting the E&S concerns of its stakeholders (employees, clients, communities, investors). The company achieves this goal through embedding E&S factors into its credit approvals process and decision making.

To this end, the company commits to:

- Comply with local E&S legislation and align with international E&S standards (in particular the European Development Finance Institution's Exclusion List, the International Finance Corporation's Performance Standards, ILO's Declaration on Fundamental Principles and Rights at Work¹ and the Customer Protection Principles);
- Respect all internationally recognized human rights, understood as the International Bill of Human Rights²;
- Develop and implement an E&S management system (ESMS) covering the credit approvals and decision-making process and allowing sound E&S risks management. This ESMS includes:
 - An Exclusion List of activities that the company will not finance for E&S reasons;
 - A process to assess E&S risks throughout the credit process;
 - A process to pass the company's E&S requirements on to clients when needed, including through loan agreements and direct engagements with clients;
 - A client monitoring procedure with respect to E&S matters;
 - Assigning specific roles and responsibilities concerning E&S matters within the company;
 - A framework to proactively respond to emergency situations at the company's premises;
 - Procedures allowing for internal and external stakeholders to express their grievances;
 - Establish a focused E&S training program for all internal stakeholders³.
 - Maintain an open and transparent communication system with its employees, clients, suppliers, shareholders and other stakeholders regarding E&S issues;
 - Periodically communicate on its E&S performance to employees, clients, shareholders and investors; and
 - Allocate the necessary resources towards the implementation of the ESMS

¹ This covers the 8 fundamental conventions identified by the ILO Governing Body and which are: Freedom of Association and Protection of the Right to Organize Convention (1948, No. 87); Right to Organize and Collective Bargaining Convention (1949, No. 98); the Forced Labour Convention (1930, No 29); Abolition of Forced Labour Convention (1957, No. 105); Minimum Age Convention (1973, No. 138); Worst Forms of Child Labour Convention (1999, No. 182); the Equal Remuneration Convention (1951, No. 100); and the Discrimination (Employment and Occupation) Convention (1958, No. 111).

² This consists of the Universal Declaration of Human Rights (1948), the International Covenant on Civil and Political Rights (ICCPR, 1966), and the International Covenant on Economic, Social and Cultural Rights (ICESCR, 1966).

³ Internal stakeholders shall include but not limited to: employees (permanent, contract or temporary); sales agents; consultants and directors.

3. Monitoring and Enforcement

The Company will ensure all ESG systems and processes are duly monitored through active and timely data collection and analysis. ESG Information will be regularly reported through the appropriate channels to the Group Sustainability Committee and escalated to the Board. Corrective actions will be developed and implemented to systematically improve ESG performance and mitigate ESG risks.

4. Review of the Policy

This policy will be reviewed every two years and any revised version shall be submitted to the Board for approval.

5. Approval

This policy is approved by the Company's Board of Directors on 23/08/2023.