



Younited

CODE OF CONDUCT

November 2022

Younited intends to act as a responsible credit institution, in accordance with the expectations of its **Stakeholders** (clients, employees, investors, partners, suppliers and regulatory authorities).

This Code of Conduct (hereinafter the “Code”) defines rules of professional conduct based on Younited’s values and commitments in order to promote ethical individual and group behaviour. This Code applies to all permanent or temporary Employees, in France and abroad.

Employees at Younited are committed to complying with these fundamental rules, to build and maintain the trust of all Stakeholders and work in an **ethical and trustworthy business environment that serves clients’ best interests**.

In addition, an internal risk control and management system has been set up to ensure compliance with these commitments and the laws and regulations in force.

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Values and commitments

1. Our values

Younited's primary mission is **to augment its clients' financial peace of mind by enabling them to concretize their life projects through simple financing and payment solutions, and by assisting them to advance their financial education.** To achieve these goals, Employees undertake to respect a base of five common values in all regions in which they do business.

- **Make it simple:** Our aim is to design simple products that provide an optimal, transparent and understandable user experience.
- **Act as an entrepreneur:** Each Employee is free to make proposals, promote their ideas, develop them and, simply, to dare!
- **Innovate or die:** At Younited, we enjoy challenges, and disrupting the banking industry by offering a new way of lending is one of them! It is proof of the need to innovate, to question and to be imaginative to meet the needs of our Stakeholders.
- **Faster is better:** At Younited, we decide and act fast. We strive to do things well but quickly.
- **No limit:** Aiming ever higher and pushing one's limits is a crucial value that we apply realistically and with humility. This also means that when we take decisions we take into account the law and the social and environmental impact of our activities on all our Stakeholders.

2. Our commitments

Social and environmental impact is a major concern for Younited.

Younited has included in its articles of incorporation its goal of generating a positive and significant impact when conducting its business. Therefore, the company's Management Board and Supervisory Board undertake to **consider the social, societal and environmental consequences** of their decisions on all Younited Stakeholders and on the environment.

The four commitments below guide our Corporate Social Responsibility (CSR) strategy and place it at the core of our business challenges and our ecosystem. Younited is also committed, both internally and in its business relationships, to comply with international human rights standards, in accordance with OECD guidelines and the fundamental values of the UN.

- **Protect our clients:** Taking out a loan is an important event that may at times generate stress and anxiety, especially if clients are unfamiliar with the financial sector. To enable clients to realise their projects while reducing their concerns and their exposure to the risk of over-indebtedness, our intent is to **make our products simple and transparent.** We also take all necessary measures to protect personal data and ensure cybersecurity.
- **Promote green practices:** We are committed to promoting best practices that help us reduce our environmental impact. Whether it is our offices certified "High Environmental Quality", our travel policy that encourages employees to limit travel between our European offices, or the search for partners who contribute to the circular economy or for "green" product development projects, **the environmental impact of all our business activities is scrutinised.**
- **Empower People:** Our goal is to **empower our clients and employees and increase their independence** to pursue their projects, careers and life paths. For our clients, we have developed Younited Coach, a free financial coaching platform to help them manage their finances. For our

employees, we implement measures enabling them to grow professionally: training, coaching, functional or geographical mobility, etc.

Foster Inclusion: At Younited, **we strongly believe in equal opportunity**. We believe that everyone, regardless of their beliefs, age, nationality, disability, family situation or gender, has a place among us. In France, we are signatories to the French Tech Parental Challenge and Gender Balance Pact and we are developing a series of measures to encourage the inclusion of all at Younited.

Rules of conduct

1. Knowledge and protection of Younited's Stakeholders

In protecting its Stakeholders, Younited takes into account the expectations of the ecosystem in which the Group operates, as well as all applicable laws and ethical obligations.

1.1. Knowledge of Stakeholders

Appropriate knowledge of Younited's Stakeholders is a key component of a comprehensive system to prevent money laundering and the financing of terrorism (AML/CFT), combat tax evasion and comply with international financial sanctions.

Employees are made aware of the importance of Know Your Customer (KYC) obligations, which concern the knowledge they are required to have of their clients or partners. Younited also has set up filtering and monitoring systems, particularly with respect to international sanctions and embargoes, to increase its knowledge of its Stakeholders.

All Employees are responsible for preventing AML/CFT risks and are informed, made aware and trained at least annually on this issue. The Compliance function coordinates the management of these risks and provides ongoing training to all Employees.

Good practices applicable to each Employee in terms of knowledge of Stakeholders

- I complete the mandatory trainings offered and proactively apply AML/CFT processes and procedures
- As a manager, I raise awareness and ensure accountability of my teams on this issue
- I pay particular attention to KYC at the time of onboarding and throughout the relationship
- I pay attention to unusual or complex transactions that may be intended to conceal illegal acts, and I follow the related escalation procedures
- I inform my supervisor and/or the Compliance teams in the event of doubt or suspicion about a Stakeholder

Confidentiality of Stakeholder data

Earning the trust of its Stakeholders is an essential goal of Younited, which is committed to **preserving the confidentiality of its Stakeholders' data**, in accordance with the laws and regulations in force.

Younited is subject to professional secrecy rules and complies with the provisions of the General Data Protection Regulation (GDPR).

Each employee is made aware of the issues raised by the processing of Stakeholders' personal data and the good practices to apply to preserve data confidentiality.

Good practices applicable to each Employee in terms of the confidentiality of personal data

- I treat each relationship with Stakeholders as confidential
- I use Stakeholders' personal data in an ethical and transparent manner and obtain their consent
- I only share Stakeholders' data based on the need-to-know principle and in compliance with applicable laws and internal standards
- Younited undertakes to collect only the data necessary for business objectives defined in accordance with the principle of proportionality

1.2. Protection of Stakeholders' interests

Younited's thorough knowledge of its Stakeholders also meets a **client protection objective**:

- Investors: in particular, Younited is subject to European regulations on investor protection and transparency of transactions.
- Borrowers: Younited implements processes and procedures to detect and manage financially vulnerable clients and to quickly handle complaints and mediation matters.

Employees therefore endeavour **to adapt the products and services they offer to the situation, objectives and risk profile** of their Stakeholders.

1.3. Defending free and fair competition

Younited is committed to promoting free and fair competition to protect the interests of its Stakeholders, as well as the integrity of the markets. This is manifested, in particular, by the **prohibition of any anti-competitive practices within Younited**. Defending free and fair competition requires:

- Compliance with competition laws;
- Active cooperation with the competition authorities;
- The prohibition against seeking a competitive advantage through illegal or unfair practices;
- Fair behaviour and integrity in business relationships with Stakeholders.

2. Ethics and professional integrity

2.1. Duty to preserve the confidentiality of Younited's information

Each Employee is bound by a **confidentiality obligation** and is responsible for preserving the confidentiality of Younited's information in all circumstances. This information is protected by conducting awareness-raising among Employees and controlling the disclosure of confidential information.

The duty of confidentiality is particularly important because the **growing use of new technologies and digital exchanges is a source of risk**. Younited has set up cybersecurity systems to deal with evolving threats that may compromise the integrity of its data.

Younited's confidential information concerns:

- Its organisation, personnel management, technology and work methodologies;
- Projects concerning the launch of new products, partnerships or activities;
- The economic results of its various activities.

To protect particularly sensitive information, Younited has put in place specific measures, particularly with respect to preventing market abuse. **Acts of market abuse are based on the unlawful use of inside information** i.e. material and confidential information relating to Younited that is not public but that, if it were public, would be likely to influence the price of the relevant financial instruments. In specific cases where Employees may come into possession of inside information, Younited implements an appropriate system for informing Employees and controlling inside information.

Good practices applicable to each Employee to protect Younited's information

- I share confidential information internally based on the need-to-know principle
- I share information externally only if authorised by Executive Management or in the cases prescribed by law
- I am vigilant whenever I share information about Younited, in particular in email threads
- Only managers or formally authorised persons may communicate with the media on business matters

2.2. Preventing corruption

Younited combats corruption by complying with applicable laws and raising Employees' awareness about the detection and prevention of acts of corruption. Younited thus complies with the French law of 9 December 2016 on transparency, preventing corruption and the modernisation of the economy (known as the "Sapin II Act"), as well as the laws applicable locally to its Entities abroad.

Bribery is any act whereby offers, promises, gifts or presents are proposed, solicited, accepted or received for the purpose of performing or refraining from performing an act or for obtaining particular favours or advantages.

Younited has an anti-corruption system based on appropriate policies and procedures that cover all Stakeholders in connection with their business relationship with Younited.

Employees are expected to act with irreproachable ethics regarding issues of corruption and any breach of the obligations set by Younited may be subject to the sanctions provided for in the company's Internal Regulations.

2.3. Rules on conflicts of interest

Managing conflicts of interest

Younited Employees must comply with the internal rules for detecting, preventing and managing conflicts of interest in order to prevent personal interests from influencing their actions or decisions.

A conflict of interest arises when there is an interference between a function in an organisation and a personal interest, and this interference influences or appears to influence the impartial and objective performance of the function. The risk is that personal interests may take precedence over the interests of the organisation or of civil society and may lead to acts of bribery, influence peddling or insider dealing, and expose the organisation to financial or reputational risks or to the risk of sanctions.

The system for preventing conflicts of interest includes a procedural framework and awareness-raising of Employees regarding the best practices to be followed in this area.

Good practices applicable to each Employee in terms of knowledge of managing conflicts of interest

- I comply with the principles set out in the Conflicts of Interest Management Policy
- I report to my supervisor and to Compliance the existence of any external interests
- I report my personal transactions to Compliance
- I inform my supervisor and Compliance of any potential conflict of interest, whether direct or indirect, and refrain from taking any action on the matters involved

Managing gifts and invitations

Receiving and sending gifts and invitations are ordinary acts in business and are not prohibited as such. However, under certain circumstances, gifts may raise suspicions of a hidden quid pro quo, may compromise the impartiality and integrity of a person or entity and may constitute the offence of bribery.

To limit this risk, Employees must comply with Younited's Gifts and Invitations Policy, which sets the limits and rules to be complied with in this area and which indicates the reporting process to be followed if applicable.

Good practices applicable to each Employee regarding gifts and invitations

- I comply with the principles set out in Younited's Gifts and Benefits Policy
- I refuse any gift or invitation that may create a conflict of interest for me
- I do not solicit gifts from individuals or companies that have a business relationship with Younited
- I seek advice from Compliance for gifts with a value over €150 and comply with the internal reporting procedure

Managing donations, corporate philanthropy and sponsorships

Donations and corporate philanthropy for the benefit of organisations that do work in the general or social interest, and sponsorship of events or projects, are common business practices for companies. They highlight the company's identity and values.

However, these practices may be diverted from their intended function and result in the payment or receipt of improper benefits, or in the misuse of funds. Younited endeavours to prevent and limit potentially harmful practices.

Personal transactions

Personal transactions by Younited Employees are not prohibited, but must be supervised in order to maintain a high level of integrity and professional ethics. Younited has an internal system for reporting personal transactions aimed, in particular, at combating the risk of conflicts of interest or fraudulent use of inside information that could lead to insider dealing.

Good practices in connection with personal transactions

- I do not use confidential information obtained in the course of my business activities at Younited to carry out personal transactions
- I do not disclose confidential information to persons close to me
- I obtain prior approval from Compliance to open an Investor account
- I obtain the necessary prior agreements before placing an order and, in particular, I complete the personal transaction reporting form

Compliance with the rules of conduct

Obligations and Sanctions

Younited Employees must comply with the rules of conduct set out in this Code. **Any breach may result in proportionate penalties, as set out in Younited's Internal Regulations, and which may include dismissal of the Employee.**

By complying with the above rules of conduct, **each Employee contributes to maintaining an ethical and reputable business environment within Younited.** Compliance with this Code is ensured by applying the internal rules set out in various related Policies and Charters (including the IT Charter).

Whistleblowing

If despite the adoption of these rules, Employees have doubts or questions, **a legal system is in place for handling them.**

If an Employee considers **that a particular situation of which they are personally aware breaches the rules set out in the Code of Conduct** or they suspect to be illegal, fraudulent or unethical, the whistleblowing system may be used.

The internal whistleblowing system is intended to collect reports from Employees about acts or situations that are contrary to the Code of Conduct. It should be used responsibly, in good faith and in a non-defamatory manner.

Younited has adopted **a Whistleblowing Procedure for its Employees** to assist them in making confidential whistleblowing reports.