

Effective from June 2022

Global Human Rights Policy

Introduction

For more than 25 years, Encore Capital Group, Inc., and its wholly owned subsidiaries (collectively “Encore”) have partnered with individuals as they repay their debt obligations, helping them on the road to financial recovery and ultimately improving their economic well-being.

Our Mission, Vision, and Values (“MVV”) represent who we are, where we’ve come from, and how we commit to our role in contributing to a healthy credit ecosystem. Our MVV is something that we live every day to help shape our future and we implement our MVV in our connections with each other, consumers, clients, and investors. We operate with industry-leading consumer-centric practices, and across all of our businesses, we hold ourselves accountable to interacting with integrity, compassion, and respect.

Encore supports fundamental principles of human rights across our business and in each region of the world in which we operate. Our aim is to align our business strategy with our Environmental, Social and Governance efforts to make a true difference for our people, communities, and consumers, and to respect and promote human rights guided by international human rights principles encompassed by the Universal Declaration of Human Rights.

This policy outlines our commitment to respect and promote human rights in accordance with internationally recognized human rights standards.

Every employee is responsible for reading, understanding, and complying with this policy. Managers are responsible for ensuring that employees who report to them comply with this policy.

Respect for Human Rights

Our approach to human rights begins with a commitment to respect the freedom and equality of every individual. This approach informs and shapes our policies, procedures and business operations enabling us to mitigate potential adverse human rights impacts that may be caused by our actions. Many of these mechanisms are integrated into our operations through established policies or procedures in the following areas:

Diversity and Inclusion

At Encore, one of our values is that we are inclusive and collaborative. We are committed to cultivating an inclusive culture that reflects our consumers and our communities, where our actions and mindset ensure every individual can thrive. We see advancing Diversity and Inclusion as a journey that we will continually work on to build a better environment for our employees and other stakeholders. We value diverse viewpoints and inclusive experiences and strive for balanced representation in our overall organization.

Respect for Human Rights (Cont.)

Fair Wages, Benefits and Working Hours

We provide fair and competitive compensation, benefits, and hours to our employees that meet the requirements of applicable law. We support employees to work to their scheduled hours and take rest breaks as may be required by state or country law. We strive to attract and retain top talent and create a work environment in which internal career growth is encouraged.

Modern Slavery, Forced Labor, Human Trafficking and Child Labor

We are committed to a work environment that respects human rights, free from human trafficking and slavery, which for purposes of this policy includes forced labor and unlawful child labor. We will not tolerate or condone human trafficking or any form of modern slavery in any part of our global organization.

Freedom of Association and Collective Bargaining

We respect the rights of our employees, which are protected by state or country law. To include, joining or forming a union/works council, engaging in collective bargaining, or engaging in other concerted activity for mutual aid and protection.

Anti-Harassment and Anti-Discrimination

We are committed to equal employment opportunity and a global work environment free from harassment, unlawful discrimination, and retaliation - an environment where all individuals are treated with integrity and equality. Therefore, Encore expects that all relationships amongst its personnel will be ethical and free of unlawful bias, prejudice, and harassment. We maintain zero tolerance for harassment and discrimination and have in place policies and procedures that address unlawful discrimination as well as inappropriate behavior that can be construed as harassment, sexual harassment, or abuse of authority.

Open Door

We are committed to having an open door regarding the reporting of complaints and encourage open lines of communication, feedback, and discussion about any matter of importance to an employee.

Vendor Conduct

Encore and its subsidiaries take a risk-based approach to ensuring vendors/suppliers go through appropriate due diligence reviews and, as applicable, adhere to the local business unit's standards, policies, and procedures before doing business.

Respect for Human Rights (Cont.)

Safe Workplace/Workplace Security

We are committed to providing a safe working environment to prevent accidents, injuries, and exposure to health risks. At Encore, the health and well-being of our employees remains a top priority. All Encore companies are responsible for having an established policy and means to communicate employee compliance with regulations, policies, evaluate hazardous concerns, make recommendations for corrective actions, and report health and safety concerns.

United Nations Declaration of Human Rights

Encore supports fundamental principles of human rights across all our lines of business and in each region of the world in which we operate guided by international human rights principles encompassed by the Universal Declaration of Human Rights.

Reporting Procedures

All Encore companies have policies and procedures in place pursuant to which employees can report any conduct they believe to be in violation of this policy. Some Encore companies have a hotline which employees can submit concerns as well. For more information, speak with the local Human Resources department or, where relevant, the person in the business responsible for promoting awareness of the hotline.

Consequences of Non-Compliance

Any violation of this policy may be grounds for disciplinary action, up to and including termination. Encore and its subsidiaries have the exclusive right to interpret this policy regarding their respective employees.

Violation of laws against human trafficking may also result in criminal prosecution of responsible individuals.