

Effective from May 2024

# Vendor Code of Conduct

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# Introduction

Encore Capital Group, Inc. and its wholly owned subsidiaries (collectively “Encore”) are committed to ethical and lawful behavior and to conducting its business with integrity and in full compliance with the applicable laws and regulations that govern its global business activities. Encore maintains high ethical standards with established business practices and regulatory compliance that apply to all employees, directors and officers.

Vendors that provide goods and/or services to Encore are expected at all times to conduct their business with honesty and integrity and observe the highest commercial standards of fair dealing. Vendors are to avoid actual or perceived conflicts of interest and are expected to abide by all applicable laws and regulations while assuring that all services are conducted with a high degree of professionalism and in accordance with the terms and conditions of the relationship.

Encore expects all vendor’s best efforts to adhere to the standards set forth in this Vendor Code of Conduct (“Code”). This Code sets out Encore’s minimum expectations for vendor conduct and is not intended to limit or discourage anyone from reaching still higher standards.

## Ethical Business Practices

### Compliance with Laws

Vendors will abide by all applicable federal, state, and local laws, rules, and regulations in the operation of their respective businesses and while performing services for Encore.

### Anti-Bribery and Anti-Corruption

Vendors will have zero-tolerance for bribery and corruption. Vendors are prohibited from engaging in activity that constitutes bribery and/or corruption, or any activity that could be perceived as engaging or tolerating bribery and/ or corruption.

### Conflicts of Interest

Vendors will disclose any potential conflicts of interest prior to initiating their relationship with Encore, or as soon as a potential conflict is made apparent after initiating a relationship.

### Privacy and Confidentiality

Vendors will protect confidential information. Vendors will adopt and maintain processes to provide reasonable protections for personal, proprietary and confidential information, including information that they access, receive or process on behalf of Encore. Vendors will comply with applicable privacy, data protection and information security laws and regulations.

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# Ethical Business Practices (Cont.)

## Gifts and Contributions

Vendors may not give, solicit, or accept gifts or entertainment that could influence or have the potential to influence their judgment of others involved in a business relationship with Encore. Gifts and any contributions must not be made on behalf of, or as a representative of Encore to any other vendor to influence a business relationship, or to request influence in favor of Encore.

## Whistleblower Protection

Vendors will have a process through which their employees can raise workplace concerns without fear of retaliation. This process should be transparent and understandable and should ensure the protection of whistleblowers.

## Encore Standards of Business Conduct

Encore employees are required to conduct every aspect of Encore's business in an honest, ethical, and legal manner. As a result, vendors must not knowingly cause an employee to violate Encore's Standards of Business Conduct, which can be found [here](#).

# Human Capital

## Employee Verification

Vendors will only employ workers who are legally authorized to work in their location and shall validate the employment eligibility of all their employees.

## Modern Slavery, Forced Labor, and Human Trafficking

Vendors will not engage in any practice that could be considered as employing or encouraging any form of modern slavery, including forced labor and human trafficking.

## Child Labor

Vendors will comply with all local minimum working age laws and requirements. Vendors will not employ or use underage labor in the production of their goods or services.

## Fair Wages, Benefits, and Working Hours

Vendors will provide fair and competitive compensation, benefits, and hours to their workers that meet or exceed the requirements of applicable law or, where statutory provisions do not exist, provide for a just and adequate standard of living for all employees. Vendors will respect the right of their employees to organize and bargain collectively for their work.

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# Human Capital (Cont.)

## Harassment/Anti-Discrimination

Encore believes that all individuals should work in an environment free from harassment and discrimination prohibited by applicable law. Vendors will not tolerate and will address unlawful discrimination as well as inappropriate behavior that can be construed as harassment or sexual harassment under applicable law.

## Diversity & Inclusion

At Encore, one of our values is that we are inclusive and collaborative. We embrace our differences and work together to ensure every individual can thrive. Encore expects its vendors to be committed to diversity and inclusion and to strive for a diverse workforce and supply chain.

## 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. You can find Encore's Global Human Rights Policy on [EncoreCapital.com](https://encorecapital.com).

# Health, Safety and Environment

## Safe Working Conditions

Vendors will provide safe and healthy working conditions to prevent accidents, injuries, and exposure to health risks. Vendors will provide all applicable laws relating to health and safety in the workplace. Vendors are also expected to provide products and services that meet all applicable health and safety requirements.

## Environment

Vendors shall operate in an environmentally responsible manner, strive to minimize adverse impact on the environment and comply with applicable environmental laws in the countries in which they operate.

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# Reporting Concerns

All vendors are expected to report any suspected or known violations of this Code or Encore's Standards of Business Conduct to either the Ethics Hotline at 800-283-0515 or by contacting Encore's General Counsel by mail at: General Counsel, Encore Capital Group, Inc., 350 Camino de la Reina, Suite 100, San Diego, CA 92108. Encore prohibits retaliation against persons who report misconduct or other concerns in good faith.

# Compliance

Encore has a responsibility to conduct appropriate due diligence before entering into relationships with key vendors. Vendors are expected to self-monitor their compliance with this Code while conducting business with or on behalf of Encore, inform Encore of any non-compliance with the Code, and remedy any such non-compliance in a timely and sensitive manner.

Encore expects all vendors to provide us with responses to our reasonable requests for information about compliance with this Code. Encore reserves the right to monitor compliance with this Code by its vendors by using a reasonable and risk-based approach and framework that is suitable for all irrespective of their scale/size. This may include verification through self-assessments/questionnaires, etc. Failure by a vendor to comply with this Code will lead to review of our relationship.

The provisions of this Code are in addition to, and not in lieu of, the provisions of any contract between a vendor and Encore. In the event of conflict between the terms of a vendor's contract with Encore and the provisions of this Code, the contract terms will prevail. If conflict between local laws or regulations and this Code exist, vendors are expected to work with us to reach a mutually agreeable solution that ensures compliance with the local law(s) or regulation(s).

Encore is committed to continuously reviewing and updating this Code. Therefore, this Code is subject to modification from time to time.