



MULTITUDE HUMAN RIGHTS STATEMENT

Adopted by the Chief Executive Officer of Multitude SE (“the Group”) and the Board of Directors.

As a multicultural and multilingual financial technology platform providing financial solutions to customers across several countries, the Group recognises the importance of prioritising the protection of human rights.

We commit to abiding by the Universal Declaration of Human Rights and are guided by the UN Guiding Principles on Business and Human Rights, the International Labour Organisation Declaration on Fundamental Principles and Rights at Work and the UN Global Compact.

As recommended by the UN Guiding Principles on Business and Human Rights, our respect for human rights acts as a guiding principle which underlines our operational and business activities.

We focus on our customers, employees and vendors and our commitment to human rights is aligned with our Code of Business Conduct and Ethics. In addition, we commit to considering partnerships and their human rights implications.

Our Group core values support our commitment and include communicating transparently, respect and customer centricity.

HUMAN RIGHTS AND OUR EMPLOYEES

We commit to the four International Labour Organisation Fundamental Principles and Rights at Work:

- a) No child labour
- b) Elimination of discrimination
- c) No forced labour
- d) Freedom of association and right to collective bargaining

The Group Code of Business Conduct and Ethics supports a safe working environment for our employees and our Harassment policy outlines how we create an atmosphere free of harassment, discrimination, exploitation, or intimidation for existing and prospective employees. We commit to zero tolerance of discrimination including based on race, age, religion, nationality, ethnicity, disability, gender, sexual orientation, and marital status.

We aim to ensure that all our employees have access to equal opportunities and that our culture is inclusive. Our Equal Opportunities policy addresses anti-discrimination.



HUMAN RIGHTS AND OUR VENDORS

We commit to:

Developing processes towards the improvement of human rights, environmental and social responsibility due diligence within our supply chain including environmental impacts, risks, and implementing appropriate policies.

HUMAN RIGHTS AND OUR CUSTOMERS

We are committed to protecting human rights for existing and potential customers and avoiding adverse human rights impacts in our customer relationships. We have implemented the following:

- a) Existing internal guidelines that oblige us to not advertise any of our services or products in a misleading, false, or deceptive manner and ensuring that customers have access to information that is relevant to their decision-making, including on interest rates and fees. In addition, we do not engage in predatory selling and lending practices.
- b) Policies and procedures that enable group-wide compliance with data protection regulations and responsibilities. We are transparent in how we handle the personal data of our customers by informing them on how their data is being used, and what measures the company has put in place to protect their personal information. Daily we ensure that data subjects requests to exercise their data privacy rights are addressed in a timely manner.
- c) Internal whistleblowing procedures are described in our Code of Business Conduct and Ethics.