



ESG POLICY

Environmental, Social and Governance

The success of Velocity is dependent upon the trust and confidence that we earn and receive from our most important stakeholders. This environmental, social and governance (ESG) policy serves to communicate the Company's commitment to ethical and sustainable business practices.

Velocity defines ESG as a combination of factors that are most relevant to our business and key stakeholder groups, including employees, investors, communities, and regulators. Our ESG strategies are aligned with the United Nations Global Compact's *Ten Principles* on human rights, labor, environment and anti-corruption (See [Exhibit A](#)). In addition to following applicable laws and regulations in all jurisdictions of our business operations, we are committed to incorporating responsible business practices in our business relationships and transactions by implementing various ESG-related measures.

In particular, the Company's leadership is committed to the ESG practices that follow, towards ensuring that risks are managed appropriately, and our business remains resilient:

Environmental Factors

- Reducing and appropriately managing our environmental impacts – such as energy, waste and water usage – and promoting responsible stewardship, when appropriate.

Social Factors

- Ensuring that the health, safety and well-being of our workforce is paramount.
- Improving communities by lending to all types of borrowers across a diverse range of backgrounds.
- Advocating respect in the workplace, with no tolerance for harassment or discrimination.
- Reflecting our diversity, equity and inclusion (DEI) values in the Company's employment practices, daily operations and ongoing communications and engagement efforts.
- Actively engaging and contributing to our communities in meaningful ways and toward positive societal impact and outcomes.
- Providing responsible labor conditions beyond satisfying basic needs and living conditions – such as allowing for equitable compensation, personal and professional growth and reasonable working hours.
- Supporting and respecting the protection of internationally proclaimed human rights standards, and ensuring that our Company is not complicit in human rights abuses.
- Protecting our people and assets with appropriate disaster response planning.

Governance Factors

- Conducting business in an ethical manner, consistent with our Code of Business Conduct and Ethics, with no tolerance for dishonesty or corruption.
- Securing our information systems and the privacy of our consumer/ customer data.
- Governing our Board in the manner prescribed by our Board and Committee Charters and our Corporate Governance Guidelines as our Board and its committees promote the goal of building long-term value for the Company's stockholders.

Additionally, the Company is committed to contracting with business partners who meet our ESG standards, beyond abiding by minimum legal and regulatory requirements alone. Our evaluation, selection and engagement procedures of business associates may include assessing the ethical values and stewardship practices of these partners, known misalignments with our own ESG principles and other factors deemed relevant.

Velocity is committed to these ESG factors and pledges its full support of, and adherence to, these standards. We will continue to evaluate and monitor our success with our ESG goals and will continue to expand our efforts as well as expanding our ESG goals by creating new initiatives as warranted that align with these standards and our ESG commitment.

Exhibit A

The Ten Principles of the UN Global Compact

Human Rights

[Principle 1](#): Businesses should support and respect the protection of internationally proclaimed human rights; and

[Principle 2](#): make sure that they are not complicit in human rights abuses.

Labor

[Principle 3](#): Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

[Principle 4](#): the elimination of all forms of forced and compulsory labor;

[Principle 5](#): the effective abolition of child labor; and

[Principle 6](#): the elimination of discrimination in respect of employment and occupation.

Environment

[Principle 7](#): Businesses should support a precautionary approach to environmental challenges;

[Principle 8](#): undertake initiatives to promote greater environmental responsibility; and

[Principle 9](#): encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

[Principle 10](#): Businesses should work against corruption in all its forms, including extortion and bribery.