

**PRA Group, Inc.**

**Environmental and Sustainability Policy**

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Document Department: Office of General Counsel

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## Version History

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## Approvals

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## Revision History

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# 1. Introduction

PRA Group, Inc. (“PRA Group” or the “Company”), believes it is the Company’s responsibility to take steps to minimize the harm that its services, processes, and facility operations have on the environment and the communities in which it operates. PRA Group’s mission, through its subsidiaries, is to deliver nonperforming loan solutions that drive success through long-term focus and Customer care. The Company recognizes that to be able to perform successfully while sustaining its mission and delivering services to its subsidiaries’ Customers effectively, it needs to responsibly promote, protect, and sustain the environment in which it operates.

## 1.1 Scope

This document applies specifically to all Employees of PRA, including any Employee contracted for temporary assignment with the expectation of compliance to the requirements, guidelines and standards listed in this policy.

## 1.2 Policy Statement

Violation of this policy or related procedures and or training materials, may result in coaching, discipline, or termination; depending on the nature and frequency of the violation, as outlined in the Employee Handbook.

## 1.3 Roles and Responsibilities

**Corporate Compliance Department (“Compliance”)** – Identifies, controls, measures, monitors and reports compliance risks across the Company. Assists business areas and Management in establishing a risk-based approach and oversight framework to manage compliance risk and ensure compliance with Company policies and procedures, laws and regulations governing PRA’s activities. Works with Management to ensure appropriate monitoring controls are in place and that oversight exists to support and demonstrate compliance with this document. Additionally, Compliance is responsible for the regular review and approval of this document in accordance with PRA’s Policy, Procedure and Training Material Writing, Approval and Acknowledgement Policy.

**Director of Environmental, Social and Governance (ESG)** – Governs the administration and enforcement of the Environment and Sustainability Policy.

**Director, Global Procurement** – Facilitates the procurement of quality goods, services and contract construction at the most favorable terms through competition and negotiation.

**Employee(s)** – Employee(s) refer to all personnel referenced in this document regardless of position, nationality, or location. Employees must comply with the terms of this document. Any questions with regard to the intent, purpose or implementation of this document are to be addressed with the respective Manager. Employees are expected to be familiar with the location, availability, and tenets of applicable documents and guidance. They are required to take all required training and acknowledge completion. An Employee who has knowledge of a violation of this document is obligated to inform their respective Manager.

**Management** – Responsible for ensuring that Employees receive, understand and adhere to the policies and procedures in this document and others that are applicable to their roles and responsibilities. Management must design, document and implement controls to ensure and evidence compliance with this Policy and monitor the effectiveness of those controls.

**Office of General Counsel (OGC)** – Provides guidance to Management to ensure written content is consistent with federal, state and municipal laws and regulations.

**Vice President (VP), Facilities and Real Estate** – Oversees all aspects of the Facilities department.

#### **1.4 Related Documents**

- Code of Conduct and Business Ethics
- Compliance Management System (CMS) Policy
- Compliance Risk Mitigation Procedure (CRMP)
- Document Retention and Destruction Policy
- Facility and Physical Security Policy
- Policy, Procedure and Training Material Writing, Approval and Acknowledgement Policy

## **2. Guiding Principles**

PRA is guided by the following principles to minimize the harm that its services, processes, and facility operations have on the environment and the communities in which it operates:

- Regulatory compliance.
- Sustainable and responsible operations, including a safe and healthy workplace.
- Resource conservation and pollution prevention (energy, water, and waste).
- Responsible procurement.
- Environmental awareness and stewardship.

### **3. Goals & Objectives**

The Company's goals and objectives include:

- Compliance with all applicable environmental laws and regulations, including applicable health and safety laws;
- Use of energy, water, and material resources responsibly and innovatively;
- Development and implementation of effective and efficient pollution prevention and mitigation programs in the areas of air emissions, waste, and water in Company facilities and operations;
- Providing places of work and operating other facilities that are environmentally safe, promote healthy indoor air quality, and are regularly sanitized;
- Providing Employees the tools and resources they need, through continuing education and training, to promote Company-wide efforts to become stewards of the environment;
- Expansion of PRA's environmental initiatives to include our Customers, communities, and suppliers through outreach and partnership; and
- Consistent measurement and reporting of the Company's progress towards environmental goals to our employees, customers, investors, and other external stakeholders.

### **4. Oversight**

The Company's Environmental, Social, and Governance ("ESG") Steering Committee (the "Committee") is responsible for overseeing management's duties related to ESG matters. The Committee will, review on an annual basis, the goals and objectives established above and recommend any needed changes. The Committee will discharge its responsibilities with the assistance of the Director of the ESG, VP, Facilities and Real Estate, and the Director of Global Procurement, or their designees. Each department is responsible for implementation and performance reporting, both of which will be monitored through the ESG program.

In connection with the discharge of its duties, the Committee will receive periodic reports on:

- The goals and objectives established; including their methodologies, basis for selection, and any material changes affecting any of the Company goals and objectives; and

- The status of the ESG Program, including progress on the stated objectives and programs reflected in this statement, relative performance compared to the Company's peers, and designated benchmarks.

## **5. Training, Instruction and Resources**

Compliance training is essential to the development and maintenance of a compliant culture and is necessary for the execution of business processes that are compliant with applicable laws, regulations and company policies. Employees are required to complete specific ethics and compliance related training modules upon joining the company and on an annual basis thereafter.

Pursuant to the Compliance Management System, Compliance, in close coordination with the Human Resources Department, is responsible for developing and maintaining compliance training content, assisting Management with training assignments and tracking/reporting Employee completion. Senior Management is responsible for ensuring that Employees complete assigned compliance training modules and then monitor, coach and enforce adherence to these policies, procedures, laws and regulations.

To ensure the most up-to-date content is available, policies are located and accessible via PRA Today. Employees seeking additional advice on any of the policies or procedures are to consult with their Managers or contact Compliance at: [ComplianceMailbox@portfoliorecovery.com](mailto:ComplianceMailbox@portfoliorecovery.com)

## **6. Compliance Monitoring and Testing**

As part of the Compliance Management System, Compliance conducts independent and periodic reviews of applicable laws and regulations. As part of this review, related policies and procedures are examined for accuracy and appropriate coverage of the associated requirements. It is the responsibility of Senior Management to take appropriate action to correct any exceptions found because of these reviews.

## **7. Internal Audit**

Corporate Audit Services is designated to conduct independent audit and advisory reviews of the Company's policies, procedures, controls, and operations as part of the Company's internal control system. Audit and advisory review results are reported to the applicable business unit, Senior Management, and the Audit Committee of the Board. It is the responsibility of Senior Management and, when applicable, Compliance Management to take appropriate action to correct any exceptions found as a result of the audit or review.

## **8. Document Retention**

This document must be reviewed no less frequently than annually. This review shall include the compliance of this document with current law, regulation or directive, the procedural implementation of this document within the current scope of operations, Internal Audit results received during the previous year and the current industry trends or regulatory guidance.

Office of General Counsel is responsible for the review and maintenance of this document and certain documents incorporated herein by reference in accordance with the Policy, Procedure and Training Material Writing, Approval and Acknowledgement Policy. Likewise, Corporate Compliance is responsible for maintaining all approved versions of this document and related documents going forward in accordance with PRA's Document Retention and Destruction Policy. To ensure visibility of the policies to staff, an approved version of this document is published on PRAToday in the "Policy Vault."