

FINVOLUTION GROUP

SUSTAINABLE DEVELOPMENT AND BUSINESS CONDUCT POLICY

FinVolution Group (the “**Company**”) adheres to the mission of “Better Finance, with Technology.”, upholds the principles of compliant operations and technology for good, and fully fulfills its responsibilities in Environmental, Social, and Governance (“**ESG**”).

This Sustainable Development and Business Conduct Policy (the “**Policy**”) has been formally reviewed and approved by the Company and applies to all employees and business partners. It serves as a public commitment and a mandatory code of conduct for all employees. The Policy covers the following areas: environmental protection responsibility, employee rights and freedom of association, responsible marketing, anti-bribery and anti-corruption, privacy and data protection. The Company strictly complies with applicable national laws and regulations, industry regulatory requirements, internationally recognized sustainability standards, and operates transparently and responsibly towards all stakeholders.

I. Environmental Protection Responsibility

The Company actively supports China’s dual-carbon strategy and integrates green and low-carbon principles throughout its business management, office operations, and technology development processes.

The Company has been driving sustainable development through pragmatic actions:

- Advancing paperless office operations, energy conservation, green commute initiatives, and data center energy efficiency optimization;
- Assessing systematic greenhouse gas (“**GHG**”) inventory and identifying, monitoring, and managing climate-related risks;
- Progressively implementing controls and reduction measures across Scope 1, Scope 2, and value chain-related GHG emissions;
- Promoting resource conservation and the proper classification and disposal of waste;
- Incorporating environmental and low-carbon requirements into supplier ESG qualification and evaluation criteria; and
- Collaborating with partners across the value chain to develop a shared green and low-carbon ecosystem.

II. Employee Rights and Freedom of Association

The Company is committed to equal employment opportunity and maintains an

inclusive, diverse workplace that respects the dignity and lawful rights of every employee.

Core Principles

- Strictly prohibiting any form of discrimination, child labor, and forced labor;
- Respecting employees' rights to freedom of association and lawful collective bargaining in accordance with applicable law, without interference in employees' exercise of their legitimate rights or participation in lawful associations;
- Adhering rigorously to labor laws and regulations governing remuneration and benefits, working hours and leave entitlements, and occupational health and safety;
- Maintaining robust mechanisms for employee communication, grievance resolution, career development and training, and physical and mental health support; and
- Extending labor rights standards to supply chain partners, safeguarding the rights and welfare of all individuals across the value chain.

III. Responsible Marketing and Financial Consumer Protection

The Company adheres to the principles of responsible financial marketing and is committed to ensuring that all product promotions and information disclosures are truthful, accurate, clear, and transparent.

Marketing Standards

- Prohibiting false advertising, exaggerated or misleading inducements, concealment of material risks, and excessive credit marketing;
- Regulating marketing channels and reviewing cooperative promotional content;
- Safeguarding financial consumers' rights to information, freedom of choice, fair treatment, and right of recourse;
- Fulfilling obligations relating to financial product suitability assessment and risk disclosure; and
- Upholding the rights and interests of vulnerable consumer groups and maintaining the highest standards of compliant, prudent, and honest marketing practices.

IV. Anti-Bribery and Anti-Corruption

The Company conducts all business with fairness, integrity and honesty, and has zero tolerance for any form of commercial bribery, improper transfer of benefits, illicit arrangements, or non-compliant related-party transactions.

Conduct Standards

- Regulating the scope and standards for business entertainment, gifts, and third-party engagements, and establishing clear integrity compliance red lines for all employees;
- Requiring employees, suppliers, and business partners to jointly adhere to integrity and self-discipline standards;
- Fostering a culture of compliance by maintaining regular compliance training programs, whistleblowing mechanisms, and accountability systems.

V. Privacy and Data Security

The Company adheres to the principles of legality, legitimacy, necessity, and transparency, and establishes a comprehensive lifecycle protection framework for users' and employees' personal information.

Data Protection Commitments

- Standardizing the management of personal information throughout its entire lifecycle, including collection, storage, use, sharing, transmission, and destruction;
- Implementing data classification and categorization, security safeguards, and compliance assessments;
- Fully protecting personal information subjects' lawful rights to access, rectification, withdrawal of consent, and account cancellation;
- Maintaining robust complaint handling and security incident response mechanisms; and
- Upholding the highest standards of privacy protection to safeguard user data and information security.

This Policy is a publicly disclosed framework. Internally, the Company establishes comprehensive management policies, implementation guidelines, and operating procedures to support the execution of the principles set forth herein. FinVolution Group reviews and revises this Policy regularly in accordance with changes in laws, regulations, and business developments, continuously enhancing sustainability governance and corporate social responsibility. The Company conducts an annual review of this Policy and organizes company-wide compliance communication and training to ensure effective implementation.