

2021 ENVIRONMENTAL, SOCIAL, AND GOVERNANCE REVIEW

Over 25 years of redefining the nonperforming loan industry.

About PRA Group

PRA Group, Inc. ("we", "us", or "our") is a global financial and business services company with operations in the Americas, Europe, and Australia. Our primary business is the purchase, collection, and management of portfolios of nonperforming loans. The accounts we purchase are primarily the unpaid obligations of individuals owed to credit originators, which include banks and other types of consumer, retail, and auto finance companies. We purchase portfolios of nonperforming loans at a discount in two broad categories: Core and Insolvency. Our Core operation specializes in purchasing and collecting nonperforming loans on which the credit originator and/or other third-party collection agencies have been unsuccessful in collecting the full balance owed. Our Insolvency operation consists primarily of purchasing and collecting on nonperforming loan accounts where the customer is involved in a bankruptcy proceeding or the equivalent in some European countries. We also provide fee-based services on class action claim recoveries and consumer bankruptcy accounts in the United States ("U.S.").

Total
RevenuesIncome from
OperationsCash
ReceiptsCash
Efficiency
RatioEstimated
Remaining Collections
as of Dec. 31\$1,095.7\$375.0\$2,076.465.3%\$6,006.6

2021 Key Business Metrics (\$ in millions)



About the Report

This is our annual environmental, social, and governance ("ESG") report ("Report"), which covers activities from January 1, 2021, through December 31, 2021. In this Report, we discuss ESG matters we consider relevant to the conduct of our business, including those reflected in the Sustainability Accounting Standards Board ("SASB")¹ standards for the Professional & Commercial Services sector, United Nations Sustainable Development Goals ("UN SDGs"),² and World Resource Institute's Greenhouse Gas Protocol³. For ease of reference, we have included a supplement that demonstrates our ESG Report's alignment with SASB standards.

Our Approach to ESG

Our approach to ESG reflects **our mission** of **delivering nonperforming loan solutions that drive success through a long-term focus and customer care.** Our ESG approach also reflects **our vision** of **being a trusted leader, changing the world's perception of the nonperforming loan industry.** This ESG Report discusses the components of our ESG program that we believe contribute to the long-term sustainability of our Company, including our focus on our environmental impact, social initiatives designed to support our customers, employees and communities in which we operate, and effective governance. We believe that this focus on ESG matters, combined with a commitment to enhancing our ESG disclosures for the benefit of our investors, employees, customers, communities, and other stakeholders, will help us be a trusted leader that can change the world's perception of the nonperforming loan industry.

¹ <u>https://www.sasb.org/</u>

² <u>https://sdgs.un.org/goals</u>

³ <u>https://ghgprotocol.org/</u>



Report Boundary

This ESG Report covers our operations, which are conducted in 18 countries on four continents around the world. We operate a total of 49 offices globally with an estimated office floor area of 585,077 square feet (54,355 square meters) in the United States and a total estimated office floor area of 195,557 square feet (18,170 square meters) in various international locations. Of the 49 offices we operate, we own three office buildings located in the United States and lease all others. As disclosed in our Annual Report on Form 10-K for the year ended December 31, 2021 ("2021 Form 10-K"), we employed 3,446 full-time equivalents as of December 31, 2021.





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We have the responsibility to manage our operations and resources in a manner that promotes sustainable practices to minimize our environmental footprint, so we focus our initiatives on minimizing energy consumption and waste generation at our offices.



We have determined that our primary impacts on the environment derive from energy consumption and waste generation at our offices and business travel.

For 2021, we reviewed our environmental impacts, which included our first carbon footprint accounting to determine our Scope 1, Scope 2, and Scope 3 emissions. For this year's report, the following emissions were estimated:

- · Scope 1 Fuels from generators that support our facilities, data centers, and small fleet of service vehicles
- Scope 2 Energy consumption from our domestic and international facilities
- \cdot Scope 3 Emissions from business travel and purchased good and services

For purposes of calculating and disclosing our emissions, we averaged 2019 and 2021 data and adjusted for anomalies in our operations that resulted from the coronavirus pandemic. As we refine our ESG reporting, we will revisit and adjust our calculations to confirm that they are representative of our typical business operations.

Despite our relatively limited environmental impact, we believe we have a responsibility to manage our operations, resources, and procurement practices in a manner that promotes sustainable practices, to minimize our environmental footprint and to mitigate our impacts on our planet.

Environmental Footprint

METRIC

Real Estate Portfolio	Our operations are supported by building facilities comprised of offices and data centers. While we own certain facilities, most of our real estate portfolio is leased and managed by landlords. As a result, our receipt and collection of certain envi- ronmental data has been limited historically. In order to estab- lish baseline usage data, we have relied on standards generally accepted in ESG reporting. Moreover, in our environmental footprint calculations, we have excluded offices that have 15 or fewer employees, as such offices are considered immaterial to our overall environmental footprint.
Scope 1 Emissions	For 2021, we measured our Scope 1 emissions based solely on assets located in the U.S. due to the nature of our international operations where we have offices in multiple countries. In the future, we will map our international assets on a comprehen- sive basis in order to calculate their actual emissions. With this background, we determined that our most significant Scope 1 emissions derive from back-up generators that support our facilities. These generators are considered essential to our op- erations. We also own a small fleet of vehicles that we use for facility operations and maintenance, which contribute to our Scope 1 emissions.



Environmental Footprint



METRIC	
Scope 2 Emissions	We have estimated our Scope 2 emissions using the 2020 data from the Emissions & Generation Resource Integrated Data- base ("eGRID") ⁴ and the widely published U.S. Department of Energy ("DOE") Energy Use Intensity (EUI) ⁵ for commercial of- fice buildings in the U.S. Currently, we are only able to provide actual metered readings of energy use (electricity and natural gas) for the three properties that we own in Jackson, Tennes- see, Hutchinson, Kansas, and Danville, Virginia.
Scope 3 Emissions	We calculated our Scope 3 emissions primarily using the U.S. Environmentally Extended Input-Output (USEEIO) Models ⁶ . We determined our supply chain emissions by focusing pri- marily on our employee travel and procurement expenditures to support our operations. For this report, we obtained data from our two main procurement management vendors. In the future, we expect to work with these vendors to enhance our Scope 3 reporting across our supply chain. We also plan to con- tinue to calibrate our Scope 3 emissions calculation by map- ping international operations that are not fully captured by our procurement portals.
	Additionally, we also included in our Scope 3 emissions our energy supply's Grid Gross Loss ("GGL") for our U.S. facilities, which we calculated using the EPA eGrid model. GGL is an es- timate of the energy lost in the process of supplying electricity to consumers through equipment such as power lines, con- ductors, and transformers.
Summary	Based on our first GHG inventory accounting, we estimate that our total global baseline greenhouse gas (GHG) emissions for 2021 were 65,060 MTCO2e.

PRA Baseline GHG Emissions (Tentative)



⁴ https://www.epa.gov/egrid

⁵ https://www.energystar.gov/buildings/benchmark/understand_metrics/what_eui

⁶ https://www.epa.gov/land-research/us-environmentally-extended-input-output-useeio-models



Environmental Footprint

12 RESPONSIBLE CONSUMPTION AND PRODUCTION	13 CLIMATE ACTION
CO	

METRIC	
Waste Footprint	For the purpose of estimating our waste footprint, we used California's Department of Resources Recycling and Recovery (CalRecycle) ⁷ published data on average waste generated by employee per day. We employed 3,446 full-time equivalents as of December 31, 2021, and estimate, based on CalRecycle's pub- lished data, that our global waste footprint is 513 tons per year. This estimate does not reflect our waste reduction initiatives describe below, which we expect to consider in the future as we refine our calculations.
Water Footprint	As noted previously, a significant majority of the buildings in which we operate are leased. As a result, the building owners and/or landlords generally collect and/or receive any metered data concerning water use and consumption. Given our limited access to metered data, we have calculated our water footprint for the first year of our water consumption reporting by using the DEO's published data on average water consumption by employee per day. Based on DOE's published data and our real estate portfolio, we estimate that our global water footprint is approximately 9,221 HCF or approximately 69,000 gallons of water per year.

Environmental Initiatives

In 2021, we implemented various environmentally friendly initiatives described below and continued others that had been implemented in previous years. Our environmental initiatives are designed to avoid harming our workspace environment while also promoting the health of our employees. In order to manage and mitigate the environmental impact of our operations, we have done the following at some or all our facilities:

METRIC

Energy

- Installed economizers in our HVAC units that use outside air to ventilate our buildings during favorable weather conditions, which saves energy by minimizing the recirculation of indoor air for ventilation.
- Used white reflective roofing material to help minimize heat absorption from the sun during warmer weather.
- Installed airlocks on door entrances to help maintain our indoor air quality and reduce the energy consumed by our air conditioning system.
- Installed energy saving light-emitting diode or "LED" lighting fixtures and Energy Star® rated appliances.
- Increased the use of motion sensors that automatically turn off interior lights when not in use, further reducing our energy usage.

⁷ https://www2.calrecycle.ca.gov/wastecharacterization/general/rates







METRIC	
Air Quality	 Used minimum efficiency reporting value, MERV 11 filters, or similarly rated filters in our facilities' or similarly rated filters, in our facilities' air filtration systems, to optimize the level of air quality in our buildings. Reduced the use of highly volatile organic compound ("VOC") chemicals by encouraging our contractors to use low VOC interior wall paints and adhesives in carpet installations.
Transportation	 Included proximity to public transportation as a criterion in our site selection process in order to improve access to and encourage use of public transportation by our employ- ees and reduce our employees' carbon emissions during their commute. Subsidized rapid transit passes for employees at our corporate headquarters. Provided electric vehicle (EV) charging stations at our San Diego, California, office and at our corporate headquar- ters. At our new HALO Kilmarnock office in Scotland, EV charging stations are available for employees and public use. We continue to explore the feasibility of installing EV charging stations in each of our facilities as and when opportunities arise.
Waste Management	 Sponsored recycling events to minimize waste. Included recycling services in our waste hauling contracts to facilitate the proper separation of our waste and divert our waste from the landfills. Recycled office paper used in most of our facilities. Promoted proper disposal of universal waste (batteries, aerosol cans, mercury and containing equipment, pesticides, and lamps) and e-waste (PCs, monitors, and printers) by using, in most cases, supplier return programs and use of universal waste drop off centers at local stores near our office locations.
Water	Used high efficiency and low flow fixtures to reduce water

• Used high efficiency and low flow fixtures to reduce water flow rates.





Environmental Initiatives



PRA Group U.K. at Kilmarnock Moves to Zero Carbon Facility In 2021, we announced a plan to consolidate approximately 300 employees from three different locations in the Kilmarnock area into the HALO Enterprise and Innovation Centre as an anchor tenant of the 23-acre HALO Digital and Innovation Park ("HALO"). HALO aims to be a net zero carbon mixed use development, providing its residents and the wider community with jobs, economic growth, skills development, access to employment opportunities, clean energy, and housing.

HALO was recently awarded the Best Regeneration Project at the Scottish Property Awards in Glasgow in March 2022, and we welcomed our employees into the building in April 2022.



Social

Our founding principles govern our focus on creating rewarding careers for our employees and aiding in their development, treating our customers with respect and empathy, and giving back to the communities in which we work and live.



Social

Our founding principles govern our focus on creating rewarding careers for our employees and aiding in their development, treating our customers with respect and empathy, and giving back to the communities in which we work and live.



Our discussion of the social prong of ESG focuses on the following areas that we have determined are important for the long-term success of our Company: our employees, our communities, and our customers.

Employees

During 2021, we celebrated our 25th anniversary with a virtual ceremony hosted by CEO and President Kevin Stevenson. Our commitment to our employees was highlighted as we celebrated key milestones, honored long-term PRA Group employees, and provided each employee with an anniversary gift. The 25th Anniversary program was notable among other employee-focused initiatives in the following areas:

- Employee engagement and retention
- Talent development
- Benefits and compensation, including equitable compensation
- Employee health and safety
- Diversity and inclusion

METRIC

Engagement and Retention

We leveraged and promoted a broad array of forums and activities throughout 2021 to foster a high performing and highly engaged workforce. Our 2021 engagement activities reflected our international footprint with several activities being global in nature, while others were defined regionally. In 2021, we facilitated employee engagement by:

- introducing a Global Diversity and Engagement Survey ("Survey") to measure our employees' impressions of our Company and obtain input on our Diversity and Inclusion ("D&I") strategic initiatives and roadmap. The insights from the Survey informed our 2021 D&I activities discussed below.
- conducting our annual employee engagement survey for our European operations.
- encouraging current, real-time feedback and insights from our employees by:
 - Completing new hire onboarding surveys to gauge our effectiveness in providing employees with the support, guidance, and tools they needed to be successful
 - Conducting exit interviews
 - Hosting one-hour, interactive sessions and townhalls with our CEO Kevin Stevenson
 - Facilitating interactive sessions between other executive officers and employees
 - Providing an online portal ("Ask PRA") through which employees can ask questions, submit concerns, and suggest innovative ideas and solutions to a stakeholder group comprised of PRA Group leadership that meets regularly to review and respond to submissions.





METRIC

Engagement and Retention

Employee retention is important to us because we value the skills, qualifications, and experiences that each employee brings to our Company. Our employee engagement activities support these efforts and support our goal of maintaining a stable, experienced workforce. Our global workforce turnover data is in line with the most recently published data provided by the U.S. Bureau of Labor Statistics for the Financial Activities and Professional and Business Services industries.

Voluntary	Involuntary	Total
32%	9%	41%

Our talent development and performance management programs focus on expanding the skills and capabilities of our employees. We provide tools to encourage optimal performance in current roles, career growth, and workforce planning. We leverage virtual learning technology to reach employees globally and offer courses in eight different languages taught by certified instructors. As a part of our commitment to coaching and developing employees, our larger Talent Management strategy includes a global performance management process that entails goal setting, feedback, coaching, mid-year and annual formal reviews, and development and career interest discussions between the manager and employee.

In 2021:

• Our employees completed over 54,000 e-learning courses and over 2,000 instructor-led courses, as reflected in the following chart.

2021	Completions	Training Hours	Average Hours per Learner	
Total Learning	al Learning 56,408		25.56	

- We introduced the Influential Leader Program to support newly adopted leader competencies such as operational decision making and building organizational talent.
- We continued to offer comprehensive leadership development programs for current and emerging leaders as individuals or as members of a cohort.
- We launched an IT apprenticeship program for employees to develop their skills and explore career paths in IT. This program has been incredibly successful in launching new careers for participants at all levels of the Company, including our collector team members throughout the U.S.
- We offered tuition assistance to support employees completing degree programs at accredited institutions.



Talent Development



METRIC

Benefits and Compensation

We are committed to promoting the physical, financial, and emotional health and well-being of our employees and their families, which is evidenced by our offering of a competitive and comprehensive benefits program. In the U.S., our robust benefits menu enables employees to choose benefits that best meet their unique needs. In addition to company-subsidized medical, dental, vision, life, and disability insurance, during 2021 we offered our employees:

- Domestic partner benefits
- Part-time employee benefits
- Infertility coverage
- 401(k) with Company match
- Generous Health Savings Account ("HSA") seed with wellness incentive
- Employee Assistance Program
- Free telemedicine and behavioral health
- On-staff personal trainer and wellness consultant in our Virginia headquarters location

In the U.S. in 2021, part-time employees became eligible for medical and health benefits and paid time off ("PTO"). Additionally, we introduced expanded benefits including a wellness incentive associated with our HSA, enhancements to paid parental leave for both mothers and fathers, and access to onsite wellness and mental health screenings.





METRIC

Benefits and Compensation

We recognize the significance of wellness to every employee and the impact the prolonged pandemic has had on the broader global population. To address this, we developed several initiatives during 2021 and our employees participated in several activities including the following:

- Introducing a suite of 18 emotional well-being e-learnings that focused on multiple facets of wellness including optimism, self-forgiveness, resilience, and looking toward the future.
- Providing mammograms onsite in the U.S. to our employees during Breast Cancer Awareness month.
- PRA Group Forest launched last year in partnership with Tree-Nation (a worldwide platform for supporting reforestation projects). Our European offices planted over 300 trees in honor of employees who participated in community impact initiatives.
- Establishing the U.K. Health and Wellbeing Network in response to feedback from a well-being questionnaire completed by U.K. employees. The network promotes well-being by raising awareness on key topics, running local campaigns like Talk Money Week to focus on financial wellness, highlighting employee stories, displaying Mental Health First Aid posters, and promoting the use of the PRA Wellbeing Centre and other support services.

Equitable Compensation. PRA Group is committed to paying employees competitively, equitably, and consistently with market and Company practices. Compensation and total rewards for our employees are based on objective factors, regardless of gender or ethnicity. Our total rewards program is reviewed regularly and structured to align with our Core Values and strategic priority of fostering a high-performing workforce. Our performance management process is designed to recognize and reward performance and contributions while aligning pay with performance.





METRIC

Employee Health and Safety

We strive to provide our employees with a safe and healthy work environment and to provide a secure atmosphere for customers and others with whom we do business. Each employee is responsible for following safety and health rules and procedures, reporting accidents, injuries, and unsafe equipment, practices, or conditions.

We are committed to providing a workplace free of all types of harassment and will not tolerate harassment of employees by managers or co-workers. We do not permit violence or threatening behavior and expect all employees to conduct themselves in a non-threatening, non-abusive manner at all times.

Our Pandemic Response. Throughout 2021, we remained focused on supporting the health and safety of our employees and protecting them from COVID-19. We provided employees with training and information on how to protect themselves from COVID-19 both in and out of the office.

At our U.S. sites, we achieved the **Global Biorisk Advisory Council's STAR™ accreditation** for the second consecutive year for high standards of cleaning, disinfection, and infectious disease prevention. We implemented screening procedures to promote workplace safety and reduce COVID-19 transmission. We also installed signage and contactless temperature check kiosks within our facilities. Each facility maintained adequate supplies of masks and hand sanitizer for employees.

In 2021 in the U.S., to promote health and safety as the pandemic continued, we:

- Encouraged employees to obtain the COVID-19 vaccine by offering PTO for the purpose of getting the vaccine plus two additional PTO days to those that became fully vaccinated.
- Awarded \$25,000 in cash prizes and additional PTO through a lottery for vaccinated employees.
- Partnered with healthcare groups local to our Virginia headquarters to provide employees and their families with convenient access to COVID vaccines through onsite vaccination clinics.
- Launched various courses designed to help employees improve their emotional and mental well-being.





METRIC

Diversity and Inclusion ("D&I")

Diversity and Inclusion Commitment Statement

At PRA Group, we value our employees' diverse experiences, perspectives, and abilities. We continue to foster a sense of belonging by working together to build an equitable and inclusive culture—where you are free to **be yourself** and **be your best**.

We believe our workforce should represent a diverse set of backgrounds, experiences, and thought because a diverse and inclusive culture helps us better understand our customers, deliver superior performance, and build long-term relationships. Our D&I programs, policies, and related activities have evolved into an enterprise commitment reflecting coordination among our Board of Directors, senior leadership team, including the CEO, and D&I Steering Committee ("DISC").

Board's Role. Our Board oversees the Company's strategic plan, of which "fostering a high performing workforce" is one of the five strategic priorities. In its oversight role, the Board receives annual reports on various employee-related matters including the Company's D&I initiatives.

Management's Role. The Chief Human Resources Officer ("CHRO") is a member of the Company's senior leadership team, which includes the Company's executive officers and certain senior leadership team ("SLT") who meet with the CEO generally on a weekly basis. The CHRO discusses with the SLT significant employee relations matters, including D&I initiatives. The SLT is also responsible for implementing the Company's strategic plan, including the strategic priority related to the Company's workforce.

DISC's Role. DISC membership is representative of a cross-departmental diverse population. For ongoing strategic integration of diversity and inclusion principles, members of our DISC serve as champions for the adoption and implementation of D&I initiatives through recommendations and feedback to proposals, programs, and processes.





METRIC

Diversity and Inclusion ("D&I")

Key D&I initiatives during 2021 included:

- Completing our first Diversity and Engagement Survey (the "Survey") and formalizing employee demographic reporting, which will allow us to measure future progress on our D&I journey. The Survey measured six key themes related to inclusion, including growth and development, leadership, authentic self, work environment, and managers. Survey results were provided to employees in an interactive format.
- Planning for the launch of the following three additional Employee Resource Groups ("ERG") based on feedback from the Survey:
 - To supplement the **Women's Affinity Network** ERG, which was created in 2020 to empower, develop, and support women through networking, awareness, and initiatives, we created the **Women in Business Advocates** ERG. This group's goal is to cultivate an inclusive environment that supports and encourages women to advance in skills and leadership potential through connection, mentorship, collaboration, and discussion.
 - Mental and Emotional Well-being, to challenge and eradicate stigma, increase awareness, and foster a community that offers support and advocacy for mental and emotional well-being for all employees.
 - **Caregivers: Allies and Advocates,** to develop a supportive community for caregivers and allies through education, resources, communication, and networking.





METRIC

Diversity and Inclusion ("D&I")

Key 2021 D&I initiatives, continued:

- Celebrating **Global Inclusion Week**, which was a weeklong celebration and learning campaign featuring activities ranging from webinars to virtual coffees for employees to learn with peers and senior leaders.
- Spotlighting women's empowerment through art, dialogue, and interactive learning by celebrating Women's History Month and sponsoring events such as the "Summer of Women" Exhibition by the Virginia Museum of Contemporary Art.
- Advancing knowledge about historical and systemic financial inequities by partnering with the Foodbank of Southeastern Virginia and the Eastern Shore to sponsor a virtual webinar titled "Racial Wealth Gap Simulator."
- Promoting mental and emotional wellness through the Coast to Coast international walking charity contest that consisted of a number of virtual, coastal walking challenges around Europe to inspire employees to get active, combat cabin fever, stay connected with each other, and donate to local charities where they lived and work.
- Offering the following eight courses that aligned with our D&I strategy:
 - Unconscious Bias
 - Embracing Change
 - Closing the Confidence Gap
 - Valuing Differences
 - Leveraging Diversity
 - Women in Leadership: Radiate Confidence
 - Women in Leadership: Superpower Your Network
 - Declare Your Brand



Social



Employees

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Workforce Diversity

For 2021, our workforce diversity metrics were as follows:

Gender

Employee Type	Female	Male	Declined to Identify	
Executive Management 35.19%		64.81%	0%	
All Other Employees	Other Employees 65.83%		2.54%	

Ethnicity

Employee Type	White	Black /African American	Native Hawaiian /Pacific Islander	Asian	Native American /Alaskan Native	Two or More Races	Hispanic /Latino	Not Specified
Executive Management	87.05%	3.70%	0.00%	1.85%	0.00%	0.00%	3.70%	3.70%
All Other Employees	28.03%	33.16%	0.12%	3.26%	0.26%	2.07%	5.85%	27.25%





Community

PRA Group is committed to giving back to the communities in which our employees live and work. Our community engagement strategy for 2021 focused on the following five areas:

- Human Services
- Health
- Education
- Arts and Culture
- Civic/Environment

We allocate charitable funds in advance of each year and often donate additional, unbudgeted funds. For example, during 2021's in celebration of our 25th Anniversary, our CEO committed an additional \$250,000 to support nonprofit organizations. As we engage with local, national, and international charities such as An Achievable Dream, United Way, and the American Red Cross, we prioritize telling the stories of these organizations on our intranet, social media, and corporate website.

During 2021, we continued to match charitable contributions of \$25 to \$2,500 made by U.S. employees to 501(c) (3) organizations that met our partner impact criteria. We also launched a new Giving Tuesday initiative through which PRA Group double matched all employee contributions made to nonprofits on that day.

In the U.S., in addition to financial contributions, we encourage employee volunteerism through paid volunteer time: each employee receives eight hours annually to volunteer in their community. To support this effort, we proactively organize multiple volunteer opportunities such as donation drives, mentoring initiatives, and clean-up activities.

2021 Global Charitable Contributions \$1,667,129



Social



Customers

Our commitment to customer welfare is evidenced by our robust training programs for customer-facing employees, policies and procedures that promote customer welfare, continual monitoring of the customer service experience, and options to facilitate user-friendly payments.

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Training	In the U.S., new hires who are customer-facing must complete a four-week orientation. A similar orientation program exists for PRA Group employees outside of the U.S., though the length of time may differ based on country and role. In addition, employ- ees must complete training annually on relevant compliance and regulatory topics that impact our customers.
Customer Welfare Policies and Procedure	During 2021, we leveraged existing policies and procedures and implemented initiatives that benefited our customers, including:
	 We leveraged our existing hardship policy in the U.S., which is designed to protect the elderly, sick, and those experiencing temporary or permanent financial difficulties. Our hardship policy allows us to respond quickly to ever-changing circumstances, such as the COVID-19 pandemic. Once notified of a hardship event impacting a customer, the customer is eligible for suspension of collection efforts for 90 days, which can be extended. In certain cases, a hardship can result in the waiver of all amounts owed to us. In the U.S., we continued our longstanding policy of not charging interest or fees on unsecured accounts. Beginning in 2020 and continuing through much of 2021, we temporarily suspended the initiation of new involuntary collection efforts such as garnishments. In addition, we sought to proactively identify geographic areas impacted by manmade or natural disasters and temporarily suspended collection efforts in those locations.





Customers

METRIC

Testing & Compliance

Facilitating Easy Payments

During 2021, we measured the effectiveness and quality of our customer experience by:

- Completing compliance testing to confirm that customer-facing processes were properly documented and complied with applicable laws and regulations.
- Sampling customer facing employees' calls to check compliance and verify that customer service standards are met.
- Conducting qualitative and quantitative research to help us better understand our customers' preferred communication methods during the debt collection process.
- Conducting user experience research when we develop new functionality to determine the new functionality's ease of use.
- Testing modifications to our payment site daily to identify customer preferences for making payments and implement the preferred option.
- Providing customer surveys after web transactions.

As a part of our overall debt collection process, we provide our customers with user-friendly options to facilitate their payments. In addition to our call centers, our customers can make payments through our website, which also has chat functionality.





PRA Group was founded on the belief that doing the right things for the right reasons for the long term will generate sustainable success and shareholder value. This approach is one of the driving forces behind our ESG initiatives.



We have a formal governance structure for overseeing and implementing our ESG program. We leveraged our governance structure during 2021 to advance significant ESG initiatives. In addition to our ESG governance structure, we consider our business ethics and general corporate governance policies and procedures to be key elements of our ESG program.

Management and Oversight of ESG

Our Board recognizes the importance of ESG to our overall strategic plan. As a result, our Board has delegated to the Nominating and Corporate Governance ("NCG") Committee oversight of our significant ESG and sustainability practices, policies, and activities. To support the Nominating and Corporate Governance Committee, we have formed an ESG Steering Committee, which is comprised of senior members of management. The ESG Steering Committee supports our Board's ESG oversight role by developing and making recommendations regarding our overall strategy with respect to ESG matters, recommending reporting standards and advising on communications with stakeholders, including our employees and investors. The ESG Steering Committee also oversees the ESG Working Group, which consists of employees across the Company whose daily responsibilities involve ESG matters and who support our ESG disclosures by collecting and providing relevant data to the ESG Steering Committee.

The following diagram depicts our ESG governance structure:



During 2021:

- Management provided quarterly ESG updates to the NCG Committee and the Chair of the NCG Committee reported on the same to the full Board.
- We published our inaugural ESG Tear Sheet.
- We adopted a Statement on Human Rights.
- We adopted a Political Contributions Statement.
- We hired a Director of ESG, our first full-time resource devoted to ESG matters.
- We formally incorporated ESG in our enterprise risk management program.





Management and Oversight of ESG

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Political Contributions Statement	As reflected in our Political Contributions Statement, we be- lieve responsible corporate citizenship includes engaging with the public policy environment in which we operate. We recog- nize the impact public policy has on our business, employees, customers, business partners, stockholders, and the commu- nities in which we operate. As a result, we continue to partici- pate in the political process by making political contributions through the PRA Group, Inc. Political Action Committee ("PRA PAC"), which is registered with the Federal Election Commis- sion ("FEC"). During 2021, political contributions made by both PRA PAC and the Company complied with our policies, were overseen by senior management and our Board, and were publicly reported monthly to the FEC.
Statement on Human Rights	Our Statement on Human Rights reinforces our founding principles of treating customers fairly and with respect, operating with high standards of compliance and reliability, and creating rewarding careers for our employees. We rec- ognize that governments are primarily responsible for pro- tecting human rights, but we believe that we have a respon- sibility to respect human rights. PRA Group works towards fulfilling that responsibility by focusing on our treatments of customers, employee well-being and security, and econom- ic and social freedom. Our internal policies and employee training programs are consistent with relevant principles in both the UN Universal Declaration of Human Rights.





Business Ethics

The Board has a dedicated Risk Committee, to which our Chief Risk and Compliance Officer ("CRCO") reports. The CRCO oversees our Compliance Department and programs, including the annual training for all employees and directors. We maintain a code of conduct which applies to all directors and employees. Oversight responsibility for investigations depends on the nature of the incident. Any complaint or allegation related to fraud or illegal acts that are accounting, financial internal controls, or internal audit-related are overseen by the Audit Committee. Certain other matters are overseen by our Office of General Counsel. We also maintain an ethics hotline that is prominent internally on our internal website and other communication channels. During 2021, all employees and directors completed annual compliance and ethics training.

Corporate Governance

METRIC

Board Composition

As disclosed in our Proxy Statement filed with the U.S. Securities and Exchange Commission on April 28, 2022, key characteristics of our Board include the following:



Board Diversity Matrix (As of March 31, 2022)					
Total Number of Directors		11			
	Female	Male	Non-Binary	Did Not Disclose Gender	
Part I: Gender Identity					
Directors	3	8	0	0	
Part II: Demographic Background					
African American or Black	1	0	0	0	
Alaskan Native or Native American	0	0	0	0	
Asian	0	1	0	0	
Hispanic or Latinx	1	0	0	0	
Native Hawaiian or Pacific Islander	0	0	0	0	
White	1	7	0	0	
Two or More Races or Ethnicities	0	0	0	0	
LGBTQ+		1			
Did Not Disclose Demographic Background		0			



Corporate Governance

METRIC

Corporate Governance Best Practices

We believe that the corporate governance practices that we have adopted are consistent with best practices for public companies our size, including the following practices:

Independent Oversight

- Our Board Committees are comprised solely of independent directors.
- A substantial majority of our Board is independent (9 of 11 directors).
- We have a Lead Independent Director who, among other responsibilities, presides over executive sessions of our independent directors, when possible and available.
- The roles of Chairman of the Board and Chief Executive Officer are separate.
- Our Compensation Committee engages an independent compensation consultant to advise and support the Committee's work.

Board Refreshment

- Our Board and all Board Committees conduct annual performance evaluations.
- We have a mandatory retirement age of 75 for non-employee directors.

Stockholder Rights and Alignment

- Our stockholders have the right to call special meetings.
- Our directors are elected annually.
- Our directors must be elected by a majority of the votes cast in uncontested elections.
- We have stock ownership guidelines that apply to our directors and executive officers in order to align their interests with the interests of our stockholders.
- All incentive compensation for our executive officers is subject to recoupment (or claw back) in the event of a restatement, to comply with applicable law or if the executive officer violates restrictive covenants included in the officer's equity award or employment agreement.

Hedging/Pledging

Our directors, executive officers, and employees are prohibited from engaging in short sales and hedging transactions and may not pledge our common stock.





Data Security & Privacy

METRIC

Data Security

We remain committed to protecting the security of customer and corporate information. We maintain a culture focused on risk management and compliance, of which our information security program is a vital part. Our information security program is built upon internationally recognized data protection frameworks including, but not limited to, current International Information Security Standards (ISO 27001:2013), the National Institute of Standards and Technology ("NIST") Cybersecurity Framework, NIST SP 800-53, the Payment Card Industry Data Security Standard ("PCI DSS"), and applicable laws and regulations. During 2021, we continued to leverage a variety of security technologies and procedures to protect customer and corporate information and deploy innovative security solutions on a global scale, including the following:

- Oversight by the Company's Board of Directors and its Risk Committee, which receives systems and technology risk updates on at least a quarterly basis.
- An information security risk and governance structure that includes a Chief Information and Security Officer and focuses on identifying cyber security risks throughout business streams, educating the business owners of risks, and providing mitigation consultations regarding requirements for alternative mitigations.
- An information security policy and related standards supported by specific control requirements.
- A threat and vulnerability management and penetration testing program to detect new vulnerabilities and assign priority for remediation, which leverages a combination of cloud-based and software agent-based scanners to detect vulnerabilities across our operations.
- Continuous penetration testing and vulnerability scanning for our high-risk external-facing applications.
- Targeted penetration testing exercises, utilizing third-party vendors and internal teams, to test the security, safety, and integrity of our data and application environment.
- A security operations center to respond to malicious behavior and identify incidents through monitoring, alerts, and analysis of network activity, as well as through cyber intelligence findings.
- Continuous risk assessments to determine implementation effectiveness and potential coverage gaps.
- Consistent communication with the Chief Risk and Compliance Officer and other members of our senior leadership team to address any potential issues in a timely manner; and
- Continual refinement of our incident response program to prepare for a cyber event.



Data Security & Privacy





Appendix

Activity Metrics

Key Business Metrics (\$ in millions)	2021	2020	2019
Total Revenues	\$1,095.7	\$1,065.4	\$1,017.1
Income from Operations	\$375.0	\$349.7	\$247.7
Cash Receipts	\$2,076.4	\$2,015.5	\$1,857.0
Cash Efficiency Ratio	65.3%	64.5%	59.9%
Estimated Remaining Collections as of Dec. 31	\$6,006.6	\$6,455.4	\$6,754.3

Environmental Metrics

Scope 1 Emissions

Assets	MTCO2e*
Generators	53.13
Fleets	9.25
TOTAL	62.38

Scope 2 Emissions

Domestic Facilities Emissions

		Area in Square Feet	Emissions in MTCO2e
Buildings Owned* Virginia, Kansas, and Tennessee	3	106,876	672
Buildings Leased	19	478,201	21,787
TOTAL	22	585,077	22,459

*Actual metered data



International Facilities Emissions

Facilities	No.	Area in SF	Emissions in MTCO2e
Buildings (Owned)	0	0	0
Buildings (Leased)	27	195,577	4,128
TOTAL	27	195,577	4,128

*Operating in 18 countries

PRA International (GHG Emissions in MTCO2e)



Scope 3 Emissions

Business Travel	Emissions in MTCO2e
Air	34
Rental Cars	TBD
Hotel Rooms	N/A*
Employee Commuting	TBD
Grid Gross Loss (GGL)	1,191
Purchased Goods & Services	37,096
TOTAL	38,321

*Data already captured from our procurement portal itemized in dollar spend and part of Purchased Goods and Services

Waste Footprint

513 tons per year

<u>Water Footprint</u>

9,221 HCF per year

Social Metrics

Number of employees

Category	2021	2020	2019
Full-time	3,316	3,657	4,254
Part-time	208	268	261
Temporary	77	60	48
Contractors	225	39	49
Total	3,826	4,024	4,612

Full-time employees by region

Region	2021	2020	2019
U.S.	2,359	2,761	3,384
Canada	77	73	71
U.K.	299	311	306
Europe	517	479	467
Other	64	33	26
Total	3,316	3,657	4,254

Global Workforce Turnover

Year	Year Voluntary		Total		
2019	34%	12%	46%		
2020	24%	12%	36%		
2021	32%	9%	41%		

Talent Development Metrics

Course Type	2021 Comple- tions	2021 Training Hours	2021 Average hrs. Per Learner	2020 Comple- tions	2020 Training Hours	2020 Average hrs. Per Learner	2019 Comple- tions	2019 Training Hours
Instructor- Led Training	2,094	104,647	78.86	1,455	61,600	42.34	2,797	82,303
e-Learning	54,314	22,529	4.53	57,053	23,215	0.41	45,369	19,016
Total	56,408	127,176	25.56	58,508	84,815	1.45	48,166	101,319

Workforce Diversity Metrics

PRA workforce demographic data is aligned with EEO-1 definitions.

Gender

Executive Management

Year	ar Female		Decline to Identify
2019	34.92%	65.08%	0.00%
2020	31.03%	68.97%	0.00%
2021	35.19%	64.81%	0.00%

All Other Employees

Year	Female		Decline to Identify
2019	71.18%	27.40%	1.42%
2020	68.74%	29.66%	1.60%
2021	65.83%	31.63%	2.54%

Ethnicity

Executive Management

Year	White	African American	Native Hawaiian /Pacific Islander	Asian	Native American /Alaskan Native	Two or More Races	Hispanic /Latino	Not Specified
2019	80.95%	4.76%	0.00%	1.59%	0.00%	1.59%	1.59%	9.52%
2020	79.31%	3.45%	0.00%	1.72%	0.00%	1.72%	3.45%	10.34%
2021	87.04%	3.70%	0.00%	1.85%	0.00%	0.00%	3.70%	3.70%

All Other Employees

Year	White	African American	Hawaiian	Asian	American	Two or More Races	Hispanic /Latino	Not Specified
2019	24.62%	40.45%	0.22%	2.49%	0.34%	2.94%	7.50%	21.43%
2020	25.81%	37.94%	0.13%	2.97%	0.31%	2.41%	5.95%	24.49%
2021	28.03%	33.16%	0.12%	3.26%	0.26%	2.07%	5.85%	27.25%

Total charitable contributions (U.S.)

2021	2020	2019
\$1,647,791.83	\$1,198,033	\$997,522

Total charitable contributions (E.U.)

2021	2020	2019
€ 17,830	€ 41,994	€ 18,575

SASB Index

Торіс	Metric	Code	Disclosure	
	Description of approach to identifying and addressing data security risks	SV-PS- 230a.1	Data Security, pgs. 29-30	
Data Sagurity	Description of policies and practices relating to collection, usage, and retention of customer information	SV-PS- 230a.1	Data Privacy, page 30	
Data Security	(1) Number of data breaches, (2) percentage involving customers' confidential business information (CBI) or personally identifiable information (PII), (3) number of customers affected	SV-PS- 230a.1	To date, interruptions of our systems and infrastructure resulting from cybersecurity incidents have been infrequent and have not had a material impact on our operations. For further information, refer to pages 29-30.	
	Percentage of gender and racial/ethnic group representation for (1) executive management and (2) all other employees	SV-PS- 230a.1	Workforce Diversity, pg. 20	
Workforce Diversity & Engagement	(1) Voluntary and (2) involuntary turnover rate for employees	SV-PS- 230a.1	Employee Engagement and Retention, pg. 12	
	Employee engagement as a percentage	SV-PS- 230a.1	Employee Engagement and Retention, pg. 13	
Professional Integrity	Description of approach to ensuring professional integrity		Information on how we approach professional integrity across the Company can be found on page 25. For our specific approach on professional integrity for employees in customer-facing roles, please refer to pages 22-23.	
	Total amount of monetary losses as a result of legal proceedings associated with professional integrity	SV-PS- 230a.1	Information on legal proceedings can be found in our 2021 Form 10-K	



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