

Policy Statement

Whistleblowing

Introduction

Enva is committed to conducting its business to high standards of integrity, openness, and accountability. It expects all employees to maintain the same standards in everything they do for or in relation to Enva. Employees are therefore encouraged to report any wrongdoing by Enva companies or employees that falls short of our business principles.

This policy has been developed to cover the reporting of any genuine concerns employees may have about suspected malpractice or misconduct within the organisation. The aim of this policy is to ensure that employees are confident that they can raise matters that concern them in the knowledge that the matter will be taken seriously, treated as confidential and, provided they are acting in good faith, will not result in them being placed at any disadvantage.

Policy

This policy applies to all permanent and temporary employees of Enva or anyone engaged by Enva for their services. It can be utilized by employees, suppliers, customers or members of the public who have a report to make under the policy which involves Enva.

While it is not possible to give an exhaustive list of the activities that constitute malpractice or misconduct, broadly speaking, individuals would be expected to report the following:

- Criminal offences including fraud and corruption;
- Failure to comply with legal obligations;
- Actions which endanger the health or safety of employees or the public;
- Actions which cause damage to the environment;
- Actions which are intended to conceal any of the above.



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Procedure

Enva hopes that, in the first instance, individuals will feel able to report a concern to a line manager or director. If, for whatever reason, individuals feel that they cannot speak with any of these about their concern or if they think the concern has not been handled properly, then they should contact Caroline Hudson, Chief People Officer at caroline.hudson@enva.com or via 0044 (07749582890)

Once a report has been made to the CPO of a concern, she will look into it carefully and thoroughly alongside the Head of Legal Services to ensure impartiality throughout the investigation. We may need to arrange a meeting with the individual to discuss their concern. If the individual is an employee, then they may bring a colleague or union representative to any meetings under this policy. Any companion must respect the confidentiality of the disclosure and any subsequent investigation.

The CPO and Head of Legal Services will discuss, as appropriate, the results of any investigation with the CEO, Chairman of Enva Group, the Enva Group Board, or a Committee thereof and other relevant officers and employees of the Group.

External investigation may be undertaken, or external advisers consulted in circumstances where it is deemed appropriate. In some cases, the receipt of the report may trigger an obligation on the part of Enva to report the matter to external regulatory authorities.

In all circumstances a report will be written in response to the original matter and sent to the individual who raised it, this report is expected to take no more than 30 working days. If this date has to be extended, then the reporter will be informed.

Confidentiality

Enva hopes that individuals will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If an individual wants to raise their concern confidentially, we will make every effort to keep their identity secret and only reveal it where necessary to those involved in investigating the concern and only if they provide consent.

External Disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating, and remedying any wrongdoing in the workplace. In most cases an employee should not find it necessary to alert anyone externally.



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The law recognises that in some circumstances it may be appropriate for an employee to report their concern immediately to an external body such as a regulator. We strongly encourage employees to seek advice before reporting a concern to anyone external. Protect operates a confidential helpline. Their contact details are at the end of this policy.

Protection and Support for Whistleblowers

- Enva aims to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.
- Whistleblowers must not suffer any detrimental treatment because of raising a genuine concern. If an individual believes that they have suffered any such treatment, they should inform the CPO or CEO immediately
- However, unfounded allegations made for malicious reasons or to pursue a personal grudge against another employee will constitute misconduct and will be dealt with in accordance with the terms of the Company's disciplinary procedure
- You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action
- Protect operates a confidential helpline. Their contact details are as follows:
Protect (Independent whistleblowing charity)
Helpline: 0203 117 2520
E-mail: whistle@pcaw.co.uk
Website: www.pcaw.co.uk

Signed, for and on behalf of Enva:

Tom Walsh
Chief Executive Officer

