

# 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.

### 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:

**Matt Collington**, Chief People Officer at [matt.collington@enva.com](mailto:matt.collington@enva.com) or via **(0044) 7876205351**.



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Upon receiving a report, the CPO will carefully examine the concern in conjunction with the Head of Legal Services, or CFO, or CEO to determine if an investigation under the whistleblowing procedure or another company procedure is warranted. The decision will be communicated to the individual who raised the concern.

A meeting may be arranged to discuss an individual's concern. Employees can bring a colleague or union representative, who must maintain confidentiality.

The CPO will share investigation results as appropriate with the CEO, CFO, Head of Legal Services, Chairman, Board, or relevant officers and employees of Enva and confirm next steps and internal / external communications.

An external investigation may be conducted, or external advisers consulted when deemed appropriate. In some instances, receiving the report may require Enva to notify external regulatory authorities.

A report will be prepared in response to the original issue and sent to the individual who raised it within 30 working days. If this timeframe needs to be extended, 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.

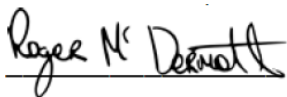
The law recognises that in some circumstances it may be appropriate for an employee to report their concern immediately to an external body such as a regulator. We strongly encourage employees to seek advice before reporting a concern to anyone external. Protect operates a confidential helpline. Their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



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## 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](mailto:whistle@pcaw.co.uk)  
Website: [www.pcaw.co.uk](http://www.pcaw.co.uk)



Roger McDermott  
Chief Executive Officer

