



FIN-POL-011

# Whistleblowing - Speak-Up Policy

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*Providing a safe and confidential route to raise concerns*

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## Finova Policy

*Built on Integrity, Discipline and Trust*

December 2025



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## Document Control

Item	Detail
<b>Policy Owner</b>	Finova Management
<b>Approval Authority</b>	Chief Executive
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<b>Review Cycle</b>	Annual
<b>Current Version</b>	V2.0

### 1. Policy Statement

Finova is committed to fostering a culture of openness, integrity, and accountability. Speaking up about concerns is an essential safeguard against misconduct and supports responsible decision-making and trust.

This policy sets out how Finova encourages and protects those who raise genuine concerns about wrongdoing, unethical behaviour, or breaches of policy.

### 2. Our Approach to Speaking Up

Finova encourages individuals to raise concerns in good faith where they believe that conduct may be unlawful, unethical, unsafe, or inconsistent with Finova's policies or values.

Raising a concern is viewed as a responsible and constructive action. Finova does not tolerate retaliation, intimidation, or disadvantage against anyone who speaks up honestly and in good faith, even if the concern ultimately proves to be unfounded.

### 3. What Concerns May be Raised

Concerns may relate to, for example:

- suspected fraud, financial crime, or corruption,
- breaches of law, regulation, or internal policy,
- unethical or improper conduct,
- health, safety, or environmental risks, or
- attempts to conceal wrongdoing.

This policy is not intended to replace normal management dialogue or grievance procedures, but to provide an avenue where concerns cannot be raised through ordinary channels or where confidentiality is required.

### 4. How Concerns are Raised

Concerns may be raised directly with Finova's management or through any other channel designated by Finova for this purpose.

Individuals are encouraged to provide as much relevant information as reasonably possible to allow concerns to be assessed. Concerns may be raised confidentially and, where appropriate, anonymously.

All concerns are treated seriously and handled with appropriate discretion.

## 5. Protection and Confidentiality

Finova is committed to protecting the confidentiality of individuals who raise concerns, subject to legal and regulatory obligations.

No individual will suffer retaliation, discrimination, or disadvantage for raising a concern in good faith. Any retaliatory behaviour will itself be treated as a serious matter.

## 6. Governance and Oversight

Responsibility for oversight of whistleblowing and speak-up arrangements sits with Finova's management.

Concerns are assessed objectively and proportionately, with escalation and investigation where appropriate. Finova may seek external professional input where required to assess or address a concern.

## 7. Relationship to Conduct and Ethics Policies

This policy operates in conjunction with related policies, including:

- FIN-POL-007 – Code of Conduct,
- FIN-POL-008 – Business Ethics Policy, and
- FIN-POL-006 – Fraud Prevention Policy.

Together, these policies support a culture of integrity, transparency, and accountability.

## 8. Alignment with Recognised Speak-Up Principles

Finova's approach to whistleblowing is informed by recognised principles of good governance and speak-up protection, as reflected in international guidance and legislation across relevant jurisdictions.

Such references guide approach and judgement, without implying certification or formal accreditation.

## 9. Review and Continuous Improvement

This policy is reviewed periodically to ensure it remains appropriate, effective, and aligned with Finova's activities and operating environment.

Finova expects all those acting on its behalf to understand their rights and responsibilities under this policy and to act responsibly when raising concerns.



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