Whistleblowing Policy

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1. Introduction

The UK Corporate Governance Code and the EU Whistleblowing Directive 2019 require companies to ensure that procedures are in place for the effective operation of arrangements to enable the workforce to raise concerns in confidence, anonymously if they wish, and for the proportionate and independent investigation of such matters.

2. Policy Purpose

Good governance requires that reporting mechanisms are well understood and trusted by our people. In addition to our internal channels, we provide independent services to enable the reporting, investigation and remedying of any wrongdoing in the workplace. Any suspected wrongdoing should be reported as soon as possible. This policy explains what should be reported, how to make a report and our commitment to treating cases confidentially and protecting whistleblowers.

3. Policy Scope

This Policy applies throughout the Group to all employees, customer representatives, contractors or other third parties working for or on behalf of our organisation, suppliers, customers, communities and other business relationships. Anybody can report an issue using our whistleblowing services. This policy is incorporated into local policies and translated into local language and communicated to employees, customer representatives, contractors and suppliers in all countries in which we do business and is publicly displayed on our website.

4. Definitions

The following definitions are used in this policy:

Group Ethics Committee	Chief Executive Officer, Chief Financial Officer, Chief Legal Officer and Chief HR Officer.
Group	International Personal Finance plc and all companies in which it directly or indirectly owns or controls the voting rights attaching to not less that 50% of the issued share capital or controls the appointment of the majority of the board of management.
Group Whistleblowing Committee	Group Senior Legal Manager and Group Fraud Risk and AML Manager.
Investigations and Reporting Protocol	An agreed set of standards and processes to ensure integrity and diligence in all whistleblowing investigations as referenced in paragraph 5.2 below.
Local Legal Directors	The head of the Legal Function in each market.
Local Whistleblowing Governance Body	A governance body or committee including at least one local board level representative designated as having oversight of whistleblowing matters in each market.
Local Whistleblowing Leads	Subject matter experts appointed for each of our businesses.

5. Policy Requirements

5.1 How to raise a concern

You are requested to report colleagues, managers, directors, agents, representatives, contractors, suppliers or any other person working with or on behalf of our organisation if you believe that they are in some way involved in any activity which is illegal or dishonest. Examples of the types of information which should be disclosed are below but if in doubt please raise your concern and it will be appropriately and discretely assessed:

- Criminal activity or failure to comply with a legal obligation;
- Financial malpractice, impropriety or fraud;
- Danger to public health or damage to the environment;
- Bribery or tax evasion;
- Sexual harassment or physical violence;
- Drugs or alcohol in the workplace; and
- Improper conduct or unethical behaviour.

We hope that in most cases you will be able to raise any concerns that you might have with your line manager, HR team, local management team or other appropriate channel for raising issues depending on what it relates to. However, where you prefer not to for whatever reason, or if a concern you have raised is not resolved to your satisfaction, please use our independent whistleblowing services. The services are hosted by third party providers and are available 24/7 in local languages. Details on how to access the services are set out below and details of any local hotlines or email addresses are contained in local policies and communications.

To raise a concern through our independent whistleblowing channels go to https://report.whistleb.com/en/ipf for European, IPF Digital or Group related matters or https://hacerlocorrecto.ethicsglobal.com/ for Mexico. You may raise your concern anonymously if you wish.

5.2 Investigation of your report

You will receive an acknowledgement of your report within 7 days and further feedback as soon as possible. Your report will be assessed by the Group Whistleblowing Committee and will be investigated by appropriate independent individuals in accordance with our Investigations and Reporting Protocol. Your case will be fully investigated and the outcome reported back to you within 3 months or, if circumstances require investigations to continue into an extended time period, within 6 months.

The Investigations and Reporting Protocol sets out standards and processes to ensure integrity and diligence in all whistleblowing investigations. It includes procedures:

5.2.1 For immediate assessment and escalation of significant cases to the Group Ethics Committee;

5.2.2 To ensure confidentiality is maintained and any potential conflicts of interest are managed. Individuals referenced in a report will not be party to any investigations. If any individuals on the Group Ethics Committee are referenced in a report it will be escalated to the Chair of the Audit and Risk Committee; and

5.2.3 To provide investigators with guidance and training on how to conduct a thorough and independent investigation.

Individuals responsible for conducting investigations are required to have suitable experience and expertise in this area and receive appropriate training on the requirements of the Investigations and Reporting Protocol.

5.3 Confidentiality and protection for those speaking up

All concerns will be handled confidentially and discretely. The independent reporting and investigation services allow you to raise issues anonymously if you wish and still enable you to receive updates on the progress and conclusion of any investigation. We do, however, encourage you to provide your name and details to better conduct investigations with more information. Your identity will be kept as confidential as possible.

People speaking up will not suffer any detrimental treatment or retaliation as a result of raising a sincere concern. We encourage openness and support for anyone raising honest concerns under this whistleblowing policy, even if they turn out to be mistaken. False allegations made intentionally and maliciously, however, may be subject to appropriate disciplinary action.

5.4 External disclosures

In some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone external. Advice can be sought from "Protect" in the UK who offer a confidential helpline. To contact "Protect" go to https://protect-advice.org.uk/

6. Roles and Responsibilities

Our whistleblowing processes are managed and overseen by governance bodies at all levels of the organisation as set out below.

Audit and Risk Committee	Reviewing the adequacy and security of the Group's whistleblowing arrangements.
Group Ethics Committee	Reviewing quarterly reports on whistleblowing matters and ensuring appropriate investigation of significant matters.
Group Whistleblowing Committee	Ensuring oversight and effective operation of our whistleblowing services across the Group, proportionate and independent investigation of cases, escalation of significant matters and reporting to the Group Ethics Committee and Audit and Risk Committee and implementation of the requirement of the Investigations and Reporting Protocol.
Local Whistleblowing Governance Body	Oversight of the effectiveness of local whistleblowing systems.
Local Whistleblowing Leads	Ensuring effective operation of local whistleblowing mechanisms, compliance with Group standards and procedures including implementation of the requirements of the Investigation and Reporting Protocol, translation and communication of this policy locally, escalation of significant matters to the Group Whistleblowing Committee and reporting to a Local Ethics Governance Body. Local whistleblowing Leads must each appoint a deputy to ensure independence and continuity of service.
Local Legal Directors	Ensuring that local management teams and local businesses understand the importance of the Group's whistleblowing

	channels and how they underpin the Group's Code of Ethics and fully support and engage with whistleblowing processes.
You and everyone associated with the Group	Everyone is requested to report any wrongdoing in the workplace in accordance with this policy.

7. Policy Governance

7.1. Breaches and Exceptions to Policy

Exceptions to Policy	No deviations from this policy are permitted.
Breaches	Breaches must be escalated to the Chief Legal Officer.

7.2. Assurance

Owner	This Policy is owned by the Chief Legal Officer.
Assurance mechanisms	Whistleblowing protocols included in the regular fraud compliance checking process. Quarterly reporting to the Reporting quarterly to the Group Ethics Committee and bi-annual reporting to Audit and Risk Committee.

8. Related Policies

Breaches of any Group policy can be reported through our whistleblowing channels. The following policies are particularly relevant:

Anti-Bribery and Corruption
Anti-Facilitation of Tax Evasion
Code of Ethics
Human Rights and Modern Slavery