1. OVERVIEW

The Sigma Connected Group of companies is part of the Digicall Group and comprises:

Sigma Connected Holdings Limited ("SCHL") which is authorised and regulated by the Financial Conduct Authority (FCA).

Sigma Connected Group Limited ("SCGL" or 'Sigma'), a wholly owned subsidiary of SCHL and the main trading style for the group.

Sigma Connected Limited, a wholly owned subsidiary and Appointed Representative of SCHL.

Sigma Connected (Pty) Limited, Cape Town (South Africa), a wholly owned subsidiary of Digicall and an Appointed Representative of SCHL.

Sigma Connected Proprietary Limited, Brisbane (Australia), a wholly owned subsidiary of SCHL.

McLaren Credit Services and **Reach:Out** are both trading styles of Sigma Connected Limited.

Appointed Representatives can carry out regulated activities on behalf of SCHL.

Sigma Connected Holdings Limited, as Principal, take full responsibility for ensuring compliance with the FCA's handbook of rules and guidance.

Sigma provide outsourced debt collection and white label business processing services to a range of companies across multiple sectors. As such, those activities are subject to the rules of various regulators in multiple jurisdictions.

These regulators define standards and expectations for corporate conduct. This policy aims to define a regulator and jurisdiction agnostic, best of breed standard across sectors, regulators and the corporate group as a whole.

2. SCOPE OF THE POLICY

2.1 POLICY PURPOSE

Understood correctly, whistleblowing is not about informing in the negative, anonymous sense but rather about raising a concern about malpractice within an organisation. Whistle-blowers act in good faith and in the company's best interest to raise concerns around suspected impropriety within their place of employment. However, they often risk or fear victimisation, recrimination and sometimes dismissal. This policy describes the process for Whistleblowing within the Sigma Connected Group.

2.2 POLICY STATEMENT

The Group aim to ensure compliance with this policy as an internal standard and, by doing so, satisfy FCA rules contained in the Senior Management Arrangements Systems and Controls (SYSC) Handbook and meet all jurisdictional legislation including:

- UK 'Public Interest Disclosure Act 1998 (PIDA)
- UK 'Enterprise and Regulatory Reform Act 2013 (ERRA)'
- The EU's 'EU Whistleblowing Directive (2019/1937/EU) (Directive)'
- South Africa's 'Protected Disclosures Act no 26 of 2000'
- Australia's 'Corporations Act 2001'

This policy forms part of the Risk Policy Suite.

2.3 POLICY SCOPE

This policy is designed to deal with concerns raised in relation issues relating to fraud, corruption, misconduct, and malpractice within the Group.

The policy will not apply to personal grievances, which will be dealt with under existing procedures on grievance, discipline, and misconduct. Details of these procedures are obtainable from the Human Resources Department.

A 'reportable event' for the purpose of this policy means any *genuine* concern including, but not necessarily limited to:

- Financial misconduct
- Health and safety risks
- Environmental damage
- Unfair discrimination
- Corruption and misconduct
- Attempts to suppress or conceal any information relating to any of the above.

If, during an investigation, any concern raised in relation to the above matters appears to the investigator to relate more appropriately to grievance or discipline, those procedures will be invoked.

3. INTRODUCTION

Transparent Whistleblower policies are essential to good risk management and corporate governance. They help uncover misconduct that may not otherwise be detected. Often, such wrongdoing only comes to light because of individuals (acting alone or together) who are prepared to disclose it, sometimes at great personal and financial risk.

Sigma Connected Group aims to encourage protected disclosures by:

- reassuring workers that silence is not the only safe option
- providing strong protection for workers who raise concerns internally
- protecting more general disclosures provided that there is a valid reason for going wider and that the particular disclosure is a reasonable one.

An organisation that positively encourages whistleblowing stands a far better chance of demonstrating that it is properly run and managed. Advance Call has been appointed as Sigma's service provided in order to establish, maintain, and operate an independent Ethics and Fraud Hotline. Advance Call are part of our parent group and, as such, steps have been taken to ensure that the process for making a disclosure remains impartial and that the rights of people making a disclosure are protected.

4. RAISING A CONCERN

4.1 WHO CAN RAISE A CONCERN?

Any current or former member of staff, client or member of the public who has a reasonable belief that there is corruption or misconduct relating to any reportable event can raise a concern under the procedure detailed.

Concerns must be raised without malice, in good faith and not for personal gain and the individual must reasonably believe that the information disclosed, and any allegations contained in it, are substantially true.

Issues raised may relate to a manager, another member of staff or a group of staff. The perpetrator can be an outsider, an employee, a manager, a customer or an ex-employee or it could be a system or procedure in use, which causes the Group to transgress its legal obligations.

Details of how to raise a concern are confirmed within this policy.

4.2 ADOPTING A CULTURE OF OPENNESS

Sigma Connected is committed to encouraging a culture that promotes openness through involving employees, listening to their concerns, and encouraging the appropriate use of whistleblowing throughout the business, championed by Senior Management.

4.3 PROCESS: DISCLOSING ALLEGATIONS

The Sigma Ethics and Fraud Hotline will allow whistleblowers to disclose an allegation, several different channels are available.

Method	United Kingdom	South Africa	Australia
Toll-free telephone number	0808 196 3787	0800 633 337	1800 961 545
WhatsApp	+27 860 004 004	0860 004 004	+27 860 004 004
Freepost	n/a	BNT 165, Brooklyn Square, 0075	n/a
Dedicated email address	always@behonest.co.za	always@behonest.co.za	always@behonest.co.za
Online reporting on website	www.behonest.co.za	www.behonest.co.za	www.behonest.co.za
Online chat	www.behonest.co.za	www.behonest.co.za	www.behonest.co.za

A unique reference number and link to the Ethics and Fraud Portal will be provided. You may be asked to log into Advance Call to answers additional questions and have the option to attach further evidence.

Disclosures will be screened by Advance Call to determine whether the allegations are relevant and/or if the allegation should be classified as an emergency.

If your preference is anonymity, it is recommended that a new email address is created as a link will be provided to allow access to the cases throughout the investigation.

There will be three options regarding anonymity, and you have the right to choose your preference.

- Revel identity (contact details captured and shared with the investigator)
- Partial anonymity (contact details captured, but not shared with the investigator)
- Anonymity (contact details not captured)

Access to information during the investigation will be limited to Advance Call, the Director of Compliance, Risk and Audit (DCRA) and the Compliance Manager.

The Director of HR may also have access to information if the investigation is recategorised as a HR grievance and not whistleblowing.

Exception to this will be under the following circumstances:

- If the DCRA or a member of their team are implicated- the Director of HR will manage the investigation
- If the DCRA or a member of their team are implicated, and the disclosure is fraud/financial – the Chief Financial Officer (CFO) will manage the investigation
- If the Chief Executive Officer (CEO) is implicated– CFO Digicall will manage the investigation
- If the CEO and or any person within a shareholding company Digicall are implicated- Blue Pie presentative will manage the investigation

Paying due regard to the preference of the disclosing party in relation to anonymity, the CEO and Executive team will be made aware of your report at a time deemed appropriate by persons listed above. Usually this would be immediate except in circumstances where it is deemed this could jeopardise the integrity of any investigation.

4.4 RESPONSE AND TIME SCALE

We will act upon all concerns raised as quickly as is practicable, you will receive access to your cases allowing you to follow progress of the investigation and supply further evidence if required. You will be notified once the investigation is complete. You may not always be informed of the exact outcome as it could become confidential or a privacy matter to another individual, however we will always endeavour to uphold the values of openness and transparency when updating you.

4.5 INVESTIGATION

We will assess initially what action should be taken, appropriate to the reportable event. This may involve an internal inquiry or a more formal investigation. These requests will be managed through the Advance Call System. If the decision is made not to investigate, reasons will be given.

If you do have a personal interest in the matter, you must inform us at the outset.

If your concern falls more properly within the Grievance Procedure, we will tell you and your case will be referred to the HR department for investigation.

We commit ourselves to handle the matter fairly and properly. By using this policy, you will help us to achieve this. If you are unhappy with our response, there are external bodies detailed in this policy.

For guidance on how the use the Advance Call system please see appendix 1, this document provides further guidance on the following:

- Users- Recipient, investigator and contact for reporting
- Registration- How to register, login and two-factor authentication
- Dashboard- Unresolved, resolved disclosures and notifications
- Report Dashboards- Sections, client Reports and Disclosure Summary

5. OUR ASSURANCES TO YOU

Sigma Connected management are committed to this policy and will ensure that any member of staff making a disclosure will not be penalised or suffer any occupational detriment for doing so.

We adopt the definition of occupational detriment from South African legislation as: *being dismissed, suspended, demoted, transferred against your will, harassed, or intimidated, refused a reference or being provided with an adverse reference, because of your disclosure.*

Raising a concern in good faith, under the terms of this policy, will not put you at risk of losing your job or suffering any form of retribution as a result.

This assurance is not extended to employees who maliciously raise matters they know to be untrue.

6. YOUR PROTECTION

It is preferable that an individual puts their name to a disclosure and Sigma will not tolerate the harassment or victimisation of anyone raising a genuine concern. We recognise nonetheless your right to raise a concern in confidence under this policy. If you ask us to protect your identity by keeping your confidence, we will not disclose it without your consent.

However, we expect the same confidentiality regarding the matter from you.

If the situation arises where we are not able to resolve the concern without revealing your identity (for example where your evidence is needed in court), we will discuss with you whether and how we can proceed.

While we will consider anonymous reports, this policy is designed to guarantee protection for genuine whistleblowers and will not always be appropriate for concerns raised anonymously.

7. PROTECTION WARRANTY

No entity, employee or representative of the Group shall retaliate against any Employee who discloses a reportable event or genuine concern.

This policy stands as our warranty and commitment to you.

Employees who are victimised in breach of this policy or any applicable, local legislation, whether they are dismissed or not, can refer a dispute to the appropriate Commission, Mediation or Arbitration service, employment court or tribunal.

People who are dismissed for making a protected disclosure can claim either compensation, up to a maximum amount of two years' salary, or reinstatement.

Employees not dismissed, but who are disadvantaged in some other way because of making a protected disclosure, can claim compensation or ask the court for another appropriate order.

8. TRAINING

All employees receive basic training on Whistleblowing Policy and the Advance Call software solution during induction.

The policy and process plus key messages such as 'if you don't support it" report it t' and whistleblowing will be reinforced through on-site posters, email and other internal communication methods from time to time.

9. RESPONSIBILITIES

- It is the responsibility of the **Board** to ensure the Policy is effective & reviewed as required.
- **All Managers** are responsible for applying the policy in their business area.
- All **employees** have a responsibility to act in accordance with this and related policies and to disclose reportable events appropriately.
- The **Director of Learning & Development** is responsible for training delivery.
- The **Compliance Manager** is responsible for maintaining the Whistleblowing policy, process and reporting anonymised data.

10. DOCUMENT CONTROL

This Policy will be reviewed by the Compliance Manager as required, but at least Annually before the end of December, more frequently if changes are required.

Policy Owner: Rachael Keyes, Compliance Manager.
Policy Approver: Peter Hopgood-Gravett, Director of Compliance, Risk and Audit.

10.1 CHANGE LOG

Date	Author	Summary of Changes	Version
02/06/2021	Peter Hopgood-Gravett (PHG) Director of Compliance, Risk & Audit	New Policy drafted	0.2.1
04/06/2021	Nikki Slepertas	Policy published	1.0

15/06/2021	Nikki Slepertas	Updated to new branding	1.1
21/02/2022	Rachael Keyes-Compliance Manager	Added Advance Call Solution	1.2
29/03/2022	PHG	Final Amends and Approve.	2
29/03/2023	Rachael Keyes-Compliance Manager	Annual review.	3
31/01/2024	Rachael Keyes-Compliance Manager	Annual review,	4
02/01/2025	Rachael Keyes-Compliance Manager	Annual Review (No changes)	5