

# WHISTLEBLOWING POLICY

---

English

Whistleblowing Policy

11-12-2025

**Enovation Group B.V.**

---

**Contact**

+31 (0)88 8 366 366

[whistleblower@enovationgroup.com](mailto:whistleblower@enovationgroup.com)

[www.enovationgroup.com](http://www.enovationgroup.com)

## TABLE OF CONTENTS

<b>1</b>	<b>WHISTLEBLOWING PROCEDURE</b>	<b>3</b>
1.1	What is a Whistleblower ?	3
1.2	Who are you as an eligible Whistleblower ?	3
1.3	When do you report ?	3
1.4	How do you report ?	4
1.5	What do you report ?	4
<b>2</b>	<b>PROTECTION AS A WHISTLEBLOWER UNDER THE RELEVANT LAWS</b>	<b>5</b>

# 1 WHISTLEBLOWING PROCEDURE

---

At Enovation Group - and all its subsidiaries, we value and support a safe and protected work environment.

This policy will support you in safely expressing your concerns. You can find out who to contact, how to make a report and the protections that are available to you.

## 1.1 What is a Whistleblower ?

A Whistleblower is a person who is able to report a concern in any part of the business, subsidiaries, agents, customer and suppliers associated with the Enovation Group that has been observed either inside or outside of the work environment.

## 1.2 Who are you as an eligible Whistleblower ?

All current and former partners, directors, officers, company secretaries, employees, secondees, contractors, suppliers (or their employee or subcontractor) and volunteers. It also applies to your relatives, dependents or spouses.

## 1.3 When do you report ?

Whenever you think there are reasonable grounds to suspect misconduct or an improper state of affairs; an offence or contravention under EU or Commonwealth law or a danger to the public or financial system. Illegal conduct, fraud, money laundering, offering or accepting a bribe, financial irregularities, failure to comply with, or breach of, legal or regulatory requirements, and engaging in or threatening to engage in detrimental conduct.

## 1.4 How do you report ?

Do you think your suspicions can be dealt with by local management?

A. If so, please file a complaint through our regular complaint channel at <https://enovationgroup.com/en/complaint-form>

B. If not, you can either notify :

Who	Contact
<b>Our corporate board</b> <ul style="list-style-type: none"> <li>• Marcel van der Velden - CEO Enovation Group</li> </ul>	<a href="mailto:whistleblower@enovationgroup.com">whistleblower@enovationgroup.com</a>
<b>Internal trustee</b> <ul style="list-style-type: none"> <li>• Nairi Mirzaian - In-house Legal Counsel</li> </ul>	<a href="mailto:legal@enovationgroup.com">legal@enovationgroup.com</a>
<b>Outside trustee</b> <ul style="list-style-type: none"> <li>• Peter van Schelven - Out-house Legal Counsel</li> </ul>	<a href="mailto:dpo@enovationgroup.com">dpo@enovationgroup.com</a>

Note 1 : Enovation Group has appointed the In-house Legal Counsel as the internal trustee

Note 2 : Enovation Group had appointed Peter van Schelven, Out-house Legal Counsel, as their external trustee.

As Enovation Group is part of Legrand, it is also possible to report illegal and/or unethical behaviour via Legrand's website: <https://legrand.signalement.net/?lang=en>.

## 1.5 What do you report ?

Please provide as much detailed information as possible so that your report can be thoroughly investigated.

Some useful details include:

- date, time and location;
- names of person(s) involved, roles and their business group;
- your relationship with the person(s) involved;
- the general nature of your concern;
- how you became aware of the issue;

- possible witnesses; and
- other information that you have to support your report.

## 2 PROTECTION AS A WHISTLEBLOWER UNDER THE RELEVANT LAWS

---

All reports will be handled strictly confidential and your identity will not be disclosed without your consent. However, this cannot be guaranteed and will be dependent upon the legal obligations of the Enovation Group.

The reporter will receive an acknowledgement of receipt within the next 7 business days.

Information on the next steps will be given within 3 months after the confirmation of receipt;

We will treat each reporter with the utmost respect and you will be protected under the relevant Whistleblower laws.



enovation®  
care to connect