



# Global Policy

## Anti-Fraud

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## 1 Executive Summary

The objective of this Anti-Fraud Policy is to implement processes, procedures and controls that will aid in the prevention and detection of fraud against Envu while ensuring a fair treatment of matters pertaining to fraud. It is the intent of Envu to promote a culture founded on fraud prevention, detection, awareness, and accountability, to clarify acts that may be suspicious, and to provide a comprehensive framework of internal controls. This is to be executed with documented and formalized policies, procedures, processes, and other supporting safeguards as needed.

Fraud is defined by the Association of Certified Fraud Examiners as “any activity that relies on deception in order to achieve a gain. Fraud becomes a crime when it is a “knowing misrepresentation of the truth or concealment of a material fact to induce another to act to his or her detriment” (Black’s Law Dictionary). In other words, if you lie in order to deprive a person or organization of their money or property, you’re committing fraud.”<sup>1</sup>

Fraud is a breach of trust and gross violation of our [Internal Code of Conduct # 1.02](#).

This Anti-Fraud Policy is applicable to any and all acts or omissions that constitute fraudulent or suspected fraudulent activity that includes, but is not limited to, monetary items such as cash, funds, proprietary information, intellectual properties, material of value, content, data, assets, properties, consumables, office articles and supplies including stationery, deals, contracts, bribes, gifts, favors, influencing, undue prioritization, etc., for personal gains either individually or collectively by its employees and/or stakeholders of Envu.

Envu upholds a zero-tolerance approach regarding fraud. This Anti-Fraud Policy is designed to help colleagues worldwide avoid potential fraud issues. It has been developed to provide support and guidance to prevent, detect, report, and investigate when fraudulent acts are suspected. It will help us to avoid risks and meet today’s compliance challenges.

## 2 Purpose Statement

### 2.1 Policy Rationale

Fraud can have a devastating effect on Envu operations because it could result in significant financial loss, reputational loss, and other long-term business repercussions. Any allegations of fraud will be taken seriously, with no exceptions. All individuals, regardless of position, title, or tenure with the Company are expected to remain vigilant and report any suspicious activity.

Envu will identify and promptly investigate any suspected fraudulent or dishonest activity against the Company. Envu will take appropriate disciplinary and legal actions including the possibility of termination of employment, restitution, and forwarding information to the appropriate authorities for prosecution.

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<sup>1</sup> <https://www.acfe.com/fraud-resources/fraud-101-what-is-fraud>

## 2.2 Risks to be Mitigated

Fraud is any intentional act or omission designed to deceive others, resulting in the victim suffering a loss and/or the perpetrator achieving a gain. Dishonest or fraudulent activities include, but are not limited to, the following:

- forgery or alteration of documents (checks, time sheets, invoices, purchase orders, agreements, expense reports, etc.) or bank accounts belonging to the Envu Group
- misrepresentation of information on documents
- misappropriation of funds, supplies, inventories, or any other assets
- theft, disappearance, or destruction of assets
- improprieties in the handling or reporting of money or financial transactions
- authorizing or receiving payments for goods not received or services not performed
- disclosing confidential and proprietary information to outside parties
- destruction, removal, misappropriation, or inappropriate use of records, furniture, fixtures and equipment

## 2.3 Groups Affected

This Policy applies to all employees as well as consultants, vendors, contractors, outside agencies doing business with Envu, and/or, to all extent possible, any other parties with a business relationship with Envu.

## 3 Policy Content

### 3.1 Policy Statement

#### 3.1.1 Preventing Fraud

Envu has established, with the support and guidance of the Internal Audit and Risk Management functions, internal controls, policies, and procedures to deter, prevent, and detect fraud.

Subject to applicable regulations and legislations, background checks may be conducted on new employees and contractors at any time, before employment starts, during the probation period, or as otherwise required by the Company. This may include criminal background checks, employment history verification, education verification, and personal reference checks.

Vendors, contractors, and suppliers must be active, in good standing, and authorized to transact business in their country. They are subject to screening, including verification of the individual's or company's status as a suspended or debarred party.

To all extent possible contractual agreements with Envu shall contain a compliance provision referring to Envu internal regulations, and supply agreements shall provide that all suppliers shall comply with the principles set forth in Envu [Supplier Code of Conduct # 1.08](#).

Envu employees will receive fraud awareness trainings. New hires will receive a training as part of their orientation at the commencement of employment and will sign a (bilingual English

/ local language) statement acknowledging that they have received and read this Anti-Fraud Policy.

### **3.1.2 Reporting Fraud**

Any person who has a reasonable basis for believing fraudulent acts have occurred has a responsibility to immediately report the suspected act to Envu General Counsel and Chief Compliance Officer or to the Internal Audit function. Failure to report suspected fraudulent activity in a timely manner will also be subject to disciplinary action.

This report may be done verbally, by any electronic communication system, or by using Envu Compliance Hotline if the reporting person wants to remain anonymous.

Compliance Hotline contact information:

Phone: +1(800) 461-9330

Country specific Compliance Hotline numbers are listed on the internet site below.

Web reporting: <https://bit.ly/EnvuCompliance>

No other actions are to be taken until the General Counsel and Chief Compliance Officer or the Internal Audit function are aware of the suspicious activity and without their prior approval. The reporting employee shall refrain from further investigation of the incident, discussion with the alleged violator, or further discussion of the incident with any other party, unless requested to do so by law enforcement.

Retaliation and retribution will not be tolerated against any employee who reports suspected fraudulent activities. However, any employee determined to have acted maliciously or with deceit will be subject to disciplinary actions.

### **3.1.3 Investigations**

The Legal, Patents and Compliance function or the Internal Audit function have the primary responsibility for the investigation of all suspected fraudulent acts. If the investigations substantiate that fraudulent activities have occurred, the Legal, Patents and Compliance function and the Internal Audit function will determine which function will lead the investigations and will issue reports to appropriate designated personnel and, if appropriate, to the relevant Leadership Team Members.

The Legal, Patents and Compliance function or the Internal Audit function may decide to establish an investigation team based on the nature and seriousness of the allegation and facts of each case. Members of the investigation team will act in coordination and under the supervision of the Legal, Patents and Compliance function or of the Internal Audit function, will have free and unrestricted access to all Company records and premises, whether owned or rented, and will have the authority to examine, copy, and/or remove all or any portion of the contents of files, desks, cabinets, and other storage facilities on the premises without prior information or consent of any individual who might use or have custody of any such items or facilities when it is within the scope of their investigations.

Employees under investigation may be asked not to enter the Company premises or to access any Company IT device, web pages, drives or links either personally or through colleagues or

other means, until the investigation is complete. Envu also reserves the right to question the employee's colleagues, associates, outside service providers, etc., whom involvement is suspected.

If a fraudulent act involves an employee, the Legal, Patents and Compliance function or the Internal Audit function and the investigation team will determine, together with the Human Resources function, when to notify the employee and whether to recommend that the employee be suspended or temporarily reassigned during the investigation.

The Legal, Patents and Compliance function, the Internal Audit function, the investigation team and Envu Senior Management will treat confidentially all information pertaining to the case, and the same shall apply to any employees contributing to the investigations, unless requested to do so by law enforcement. The status of an investigation and the investigation results will not be disclosed or discussed with anyone other than those who have a legitimate need to know to avoid damaging the reputation of persons suspected but subsequently found innocent of wrongful conduct, and to protect Envu.

#### **3.1.4 Corrective Actions**

Depending on the facts and seriousness of the case, the actions against an employee can range from written notification and a probationary period, up to and including dismissal, and / or legal action, either civil or criminal.

Individuals at all levels of the organization will be treated equally regardless of their position, years of service, or affiliation with Envu.

Decisions to prosecute or refer investigation results to the appropriate law enforcement and/or regulatory agency for independent investigation will be made by the relevant Leadership Team Members in consultation with the Legal, Patents and Compliance function and/or Internal Audit function, as will final decisions on disposition of the case.

If the investigation results in a recommendation to sanction an employee, the recommendation will be reviewed for approval by the Human Resources function and the employee's supervisor, before any such action is taken.

In cases involving monetary losses Envu will pursue recovery of losses.

Final determination regarding actions against an individual found to have committed fraud will be made by the relevant Leadership Team Members in consultation with the Legal, Patents and Compliance function and/or the Internal Audit function depending on the details of the matter.

#### **3.2 Roles and Responsibilities**

Envu Senior Management is responsible for the detection and prevention of fraud and misappropriation, and other irregularities, with the support of the Internal Audit and Risk Management functions. Each member of Envu Senior Management should be familiar with the types of improprieties that might occur within their area of responsibility and be alert for any indication of irregularity.

Envu Senior Management is responsible to immediately report any potential instance of fraud to the Legal, Patents and Compliance function and/or the Internal Audit function. If the Legal, Patents and Compliance function or the Internal Audit function is suspected in the fraud, the notification must then be escalated to the Chief Finance Officer.

Envu Senior Management is responsible for taking appropriate corrective actions to ensure adequate controls exist to prevent the reoccurrence of improper actions. This responsibility is delegated to the Risk Management function.

The Legal, Patents and Compliance function or the Internal Audit function have the primary responsibility for the investigations of all suspected fraudulent acts and, if the investigations substantiate that fraudulent activities have occurred, for the issuance of reports to the appropriate designated personnel and, if appropriate, to the relevant Leadership Team Members.

All employees must report the concerns they have or information provided to them about the possible fraudulent activity of any employee, contractor, vendor, or any other party with an association with Envu. Any person who has a reasonable basis for believing fraudulent acts have occurred has a responsibility to report the suspected act immediately.

The Legal, Patents and Compliance function and the Internal Audit function are responsible for the administration, revision, interpretation, and application of this Policy. This Policy will be reviewed annually and revised as necessary.

### **3.3 Implementation and Training**

The Legal, Patents and Compliance, Internal Audit, and Risk Management functions have the responsibility to implement this Policy. They are also responsible for the delivery of trainings to the Envu employees.

Any deviations or changes to this Policy must be approved by the Legal, Patents and Compliance, Internal Audit, and Risk Management functions.

## **4 References**

[Internal Code of Conduct # 1.02](#)

[Supplier Code of Conduct # 1.08](#)