

## SAM SECURITY SERVICES

### Whistleblowing Policy

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**Any changes to this document must be approved by the document owner.**

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## Whistleblowing Policy & Procedure

### 1.0 INTRODUCTION

- 1.1. The Whistleblowing Policy is an important pillar in the quality management system of SAM Security Services. It is made available to all SAM staff and to the public through the company website.
- 1.2. It is expected to be made available in a simplified form in local languages

### 2.0 AIM

- 2.1. This policy aims to provide guidance to all Directors, managers, employees and personnel providing services on behalf of the company on a contract basis, if they should need to raise genuine and legitimate concerns that an instance of wrongdoing has occurred or is occurring in the practice or if they have a concern for the mental well-being of an individual. This is known as whistleblowing or, more formally, as making a disclosure in the public interest.
- 2.2. SAM aspires to implement a culture of openness and a work environment where an individual can feel confident about raising a concern without fear of reprisal.
- 2.3. We will protect an individual who makes a whistleblowing complaint in good faith and with genuine belief of wrongdoing, and anomalously in accordance with:
  - 2.3.1. International whistle-blowing standards as set by the United Nations Convention against Corruption (UNCAC)  
[https://uncaccoalition.org/es\\_ES/learn-more/whistleblowing/](https://uncaccoalition.org/es_ES/learn-more/whistleblowing/)
  - 2.3.2. The Council of Europe, the OECD Anti-Bribery Convention,  
<http://www.oecd.org/corruption/oecdantibriberyconvention.htm>
  - 2.3.3. The Public Interest Disclosure Act (PIDA) 1998
  - 2.3.4. <https://www.icaew.com/technical/legal-and-regulatory/information-law-and-guidance/whistleblowing/the-public-interest-disclosure-act-pida-1998>
- 2.4. The ICoCA complaints site can be found at <https://icoca.ch/registering-a-complaint/>
- 2.5. Therefore, it is SAM policy to never dismiss, discipline or victimise an employee who 'blows the whistle' on criminal behaviour or malpractice, but on the contrary to encourage the reporting of any such suspicions as it will allow a better internal monitoring system and the prevention of unlawful misconduct within the company or its associated parties. All complaint will be answered investigated if required within 5/7 days of the report being made.
- 2.6. This policy is under the responsibility of the CEO and shall be reviewed annually.

### 3.0 POLICY SCOPE & PRINCIPLES

- 3.1. This policy applies to all managers, employees and personnel providing services on behalf of the company (collectively referred to as 'staff members' in this policy), where their actions qualify for protection.
- 3.2. It is not permitted to dismiss, discipline or victimise a staff member who 'blows the whistle' on criminal behaviour or malpractice providing the staff member has a reasonably held belief that the information is substantially true and makes the disclosure in good faith.

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- 3.3. A qualifying disclosure is a disclosure of information where the staff member reasonably believes one of the following is happening, has taken place or is likely to happen in the future:
- 3.3.1. A criminal offence (such as money laundering, fraud or financial irregularities)
  - 3.3.2. Breach of a legal obligation
  - 3.3.3. A miscarriage of justice
  - 3.3.4. Endangering the health and safety of any individual (in particular any concerns regarding actions that are out of character for an individual)
  - 3.3.5. Damage to the environment
  - 3.3.6. Deliberate concealment of any of the above
  - 3.3.7. Direct or indirect support to non-state armed groups
  - 3.3.8. Intended personal or financial gain from abuse and exploitation of a person's position
  - 3.3.9. Money Laundering
  - 3.3.10. Inappropriate public or private security practices
- 3.4. The company's approach to whistleblowing is under-pinned by the belief that if a staff member is genuinely concerned that wrongdoing has been or is being committed, or if they are concerned about the mental wellbeing of an individual they should not ignore it. Of course, it is also the staff member's responsibility and legal obligation not to disclose any confidential information relating to the company to any third party.
- 3.5. SAM shall operate a whistle-blower policy for people working on its behalf, who have a reasonable belief that a non-conformance has occurred and respect their right to anonymously report the non-conformance internally, as well as externally to appropriate authorities. SAM will not take any adverse action against any individual for the act of making a report in good faith. The organization shall inform the client of reported violations of law or respect for human rights.
- 3.6. Affordable / free support may be offered to a complainant if they require it in order that they can make a fair complaint. This support may include: legal, impartial adviser, external adviser, translator, identified employee representative etc.

#### **4.0 POLICY STATEMENT**

- 4.1. It is our policy to conduct all our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.
- 4.2. We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by the laws of Iraq, in respect of our conduct both at home and abroad.
- 4.3. The purpose of this policy is to:
- 4.4. Set out our responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption; and
- 4.5. Provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.

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- 4.6. Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if we are found to have taken part in corruption we could face an unlimited fine, be excluded from tendering for public contracts, blacklisted from operating and face damage to our reputation. We therefore take our legal responsibilities very seriously.
- 4.7. In this policy, third party means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, contractors, sub-contractors, customers, suppliers, distributors, business contacts, agents, advisers, government and public bodies, including their advisors, representatives and officials, politicians and political parties.

**5.0 APPROPRIATE AUTHORITIES**

- 5.1. Matters that must be reported to the appropriate authorities may include;
  - 5.1.1. Knowledge or witnessing of a crime
  - 5.1.2. Knowledge or witnessing of human rights breaches
  - 5.1.3. High level financial irregularities
  - 5.1.4. Threats to Health and Safety
  - 5.1.5. If the whistleblower reasonably believes SAM would treat them unfairly if they made the disclosure to your employer or a prescribed person
  - 5.1.6. If they reasonably believe that their disclosure to SAM would result in the destruction or concealment of information about the wrongdoing
  - 5.1.7. Or have previously disclosed the same or very similar information to your employer or a prescribed person