

	Business Management System Human Resources Standard Operating Procedure	
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Title: Whistleblowing		



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## **PURPOSE**

1. The Company is committed to conducting its business to the highest possible standards. The Company believes that high standards of conduct, ethics, honesty and integrity are essential to the smooth running of its business. In order to maintain high standards the Company attaches great importance to identifying and remedying serious unprofessional or unlawful conduct in the workplace. If such wrongdoing in the workplace goes unreported, this could have a serious effect on the Company, its reputation and its business, which in turn could have a serious effect on our employees.

## **SCOPE**

2. This SOP applies to all GardaWorld employees.

## **INFORMATION**

3. The Company recognizes that employees may not always feel comfortable about discussing their concerns internally especially if they believe the Company itself is responsible for the wrongdoing. The aim of this policy is to ensure that employees are confident that they can raise any matter with the Company that concerns them in the knowledge that it will be taken seriously, treated as confidential and that no action will be taken against them unless they are responsible for the wrong doing (honesty will be considered).

4. If you have a genuine suspicion about actual or planned wrongdoing which may be against the law or which may be a serious breach of regulations, or which may threaten seriously the high standards required of all employees, you should raise your concern(s) with your Manager or the HR department by following the procedure detailed below.

5. If you follow this procedure properly you:

- a. can expect the Company to deal with your concern(s) in a responsible manner, to respect confidentiality and to take appropriate action; and
- b. have the right not to be victimised for using the procedure to raise your concern(s). The Company shall take all reasonable steps to prevent you suffering victimisation by other staff as a result of raising the concern(s).

6. This procedure has been designed to allow employees to raise concerns with the appropriate people at the Company and in the appropriate way. If you do not follow this procedure properly or abuse the procedure by raising concerns which are not genuine, you may be liable to disciplinary action, including summary dismissal.

7. If you have any doubts as to whether the behavior that you have identified is covered by this procedure, you should speak to your Manager. If, for any reason, you do not wish to speak to your Manager (because, for example, he or she is the subject of the concern(s)), you should speak to the HR department.

8. If any employee victimizes other employees who have raised concerns or if any employee deters other employees from making concerns about wrongdoings, then the employee responsible may be liable to disciplinary action, including summary dismissal, in accordance with the disciplinary procedure.

## **REQUIREMENTS**

### **GROUND FOR RAISING A CONCERN**

9. You should follow this procedure where you have a genuine suspicion about actual or planned malpractice and wrongdoing at the Company or which affects the Company. This includes malpractice or wrongdoing which:

- a. amounts to a criminal offence or breach of civil law;
- b. amounts to a breach of any statutory code of practice;
- c. amounts to corruption or fraud;
- d. amounts to a miscarriage of justice;
- e. involves danger to the health and safety of any person;
- f. involves damage or potential damage to the environment; or
- g. attempts to cover up the occurrence or likely occurrence of any of the above

10. You must raise your concern(s) in good faith and must reasonably believe that the information that you wish to disclose relates to one of the above categories of wrongdoing.

#### WHO TO RAISE A CONCERN WITH

11. You should initially raise your concern with your Manager. However, if a question or concern relates to your Manager, they may raise a question or report possible misconduct by calling the hotline phone on +1 800 491-2033 or +1 209 247 1168 or sending an email to [gwethics@garda.com](mailto:gwethics@garda.com). The reports can be made confidentially and /or anonymously.

#### HOW TO RAISE A CONCERN

12. You should initially raise your concern(s) informally, by speaking personally, and in confidence, to the appropriate person, (as indicated above). However, if you consider that it is insufficient or impractical to resolve the concern by way of a confidential discussion, you may raise the concern in writing. In any event, your Manager or a member of the HR department may request that you put your concerns(s) in writing.

13. Once a complaint is received, the Company will conduct an investigation into the allegation(s). The Company will do everything that it can to respect confidentiality and to prevent reprisals. However, in order to investigate your concern(s) properly it may be necessary for you to consent to other employees being informed of your concern(s). You may request anonymity but this may affect the Company's ability to investigate your concern(s).

14. The investigation will be conducted and concluded as quickly as possible. The Company will advise you in a manner and to an extent considered appropriate by the Company, of the outcome of any investigation. This may include disciplinary action being taken against any employee(s) suspected of malpractice. You must treat the investigation, the outcome of the investigation, any report prepared as a result of the investigation and any disciplinary arising as confidential. Any breach of confidence may lead to disciplinary action being taken, including summary dismissal.

#### OVERSIGHT BOARD

15. GardaWorld has an Oversight Board consisting of GardaWorld's President and COO, General Counsel and Head of HR, Director, Insurance, Risk and Welfare, Director, Compliance and Assurance and Senior Managing Director, UK. Any of these employees can be contacted if

needed for any questions regarding your concerns, or to report a violation. The Oversight Board will also decide how the Company shall act in relation to reported incident.