

	SAFETEC SECURITY LIMITED	Doc. No. SSL/POL/004	
	Policy on whistle Blowing	Effective Date: 30/01/ 2025	
		Rev: 00	Issue No. 01

1. Purpose

This policy establishes Safetec Security's whistle-blower framework, ensuring that individuals working on its behalf can report non-conformances, violations of laws, and breaches of human rights without fear of retaliation. It ensures compliance with ISO 18788 Clause 8.8.4 and Ugandan whistle-blower protection laws.

2. Scope

This policy applies to all Safetec Security personnel, contractors, and subcontractors, allowing them to report violations internally and externally to appropriate authorities while ensuring protection from retaliation.

3. Procedures

3.1 Reporting Non-Conformance and Violations

- Individuals shall anonymously report:
 - Violations of ISO 18788, Ugandan laws, or human rights standards.
 - Unsafe working conditions or operational misconduct.
- Reports can be submitted through:
 - The command centre.
 - Anonymous email submissions to the human resource department.
- Reports may also be submitted externally to appropriate authorities without fear of reprisal.

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3.2 Protection Against Retaliation

- No adverse action shall be taken against any individual reporting a violation in good faith.
- Retaliation, including dismissal, demotion, harassment, or intimidation, is strictly prohibited and shall result in disciplinary action.
- Affected individuals may request protective measures, including:
 - Reassignment to another role or location.
 - Confidential support from the Human Resources Department.
 - Legal assistance if required.

3.3 Protection for Whistleblowers

- If a member of staff makes a disclosure in conformity with this Policy, the member shall not:
 - Be dismissed from employment.
 - Have salary increases or employment-related benefits withheld.
 - Be transferred or reassigned.
 - Be denied a promotion that the employee otherwise would have received.
 - Be demoted.
- If any other member of Safetec Security makes a disclosure in conformity with this policy, they will not be subjected to detrimental action.
- Any individual who takes retaliatory action against a whistleblower will be subject to disciplinary action up to and including termination of services.

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3.4 Confidentiality and Anonymous Disclosures

- Safetec Security shall treat disclosures made under this policy with utmost confidentiality. The substance of an investigation, including the identities of the parties, will remain confidential and may only be disclosed in the following circumstances:
 - Where the law requires disclosure.
 - The whistleblower has waived their right of confidentiality.
 - The identity of the whistleblower or substance of disclosure is already publicly known.
 - The information is given on a strictly confidential basis for the purpose of obtaining professional advice.
- Whistleblowers making disclosures under this policy are encouraged to reveal their identity. However, anonymous disclosures will be considered at the discretion of the human resource department based on:
 - The seriousness of the issues raised.
 - The credibility of the information disclosed.
 - The likelihood of confirming the information from other sources.

3.5 Investigation of Whistle-Blower Reports

- The HR Department shall:
 - Conduct independent and confidential investigations.
 - Cooperate with law enforcement and relevant human rights bodies where necessary.

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- Ensure timely resolution and corrective actions.
- Investigations shall be:
 - Fair and impartial, protecting all involved parties.
 - Documented securely, ensuring evidence integrity.
- Findings and corrective actions shall be reported to senior management and, where required, to the client and relevant authorities.

3.6 Informing Clients and External Authorities

- Safetec Security shall inform clients of any reported legal or human rights violations.
- Where necessary, cases shall be escalated to law enforcement, regulatory agencies, or human rights organizations.

3.7 Withdrawal of Protection

- Safetec Security may revoke whistleblower protection if:
 - The whistleblower has participated in the reported corruption or malpractice.
 - The disclosure was made maliciously or was knowingly false.
 - The disclosure was baseless or intended to harm others.
 - The disclosure primarily questions the merits of government policy rather than reporting wrongdoing.
- If protection is revoked, the HR Department shall provide written notification to the whistleblower.

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3.8 Sanctions

- A whistleblower who acts in bad faith by making false or malicious allegations shall be subject to disciplinary proceedings.
- Any individual who suppresses, conceals, or interferes with an investigation will face disciplinary action.

3.8 Awareness and Compliance

- All personnel shall be trained on:
 - How to report violations anonymously.
 - Their rights under the whistle-blower policy.
 - Protection mechanisms against retaliation.
- The whistle-blower policy shall be:
 - Reviewed whenever necessary to ensure effectiveness.
 - Communicated clearly to all personnel, subcontractors, and clients.

4. Approval



Managing Director