



Whistle-blower Policy

Purpose

The purpose of this Whistle-blower Policy is to encourage and facilitate the reporting of illegal, unethical, or inappropriate conduct by employees, contractors, and other stakeholders connected to Argus Security Company. This policy aims to protect individuals who report misconduct, ensuring that concerns are addressed promptly and appropriately without fear of retaliation.

Scope

This policy applies to all employees, contractors, officers, and board members of Argus Security Company, as well as clients, partners, and visitors who may witness or become aware of misconduct or violations related to company operations.

Policy Statement

Argus Security Company is committed to maintaining the highest standards of integrity and ethics in all its operations. We encourage individuals to report any suspected misconduct, including but not limited to:

- Violations of laws or regulations
- Fraud or financial irregularities
- Breaches of company policies or codes of conduct
- Human rights violations
- Corruption or bribery
- Unsafe working conditions
- Discrimination or harassment

Reporting Mechanism

- Confidential Reporting Channels: Individuals are encouraged to report concerns using one or more of the following methods:
 - Directly to a supervisor or manager.
 - To the Human Resources Department.
 - Through a confidential whistle-blower hotline or email address established by the company.
- Anonymous Reporting: Reports can be made anonymously if desired. However, providing contact information may facilitate a more thorough investigation.

Protection from Retaliation

- No Retaliation Guarantee: Argus Security Company strictly prohibits any form of retaliation against individuals who report concerns in good faith, participate in investigations, or provide evidence related to reported misconduct.
- Investigative Support: Any alleged retaliatory actions will be investigated immediately, and appropriate corrective action will be taken against individuals found to have engaged in retaliatory behavior.

Investigation Process

- Prompt Investigation: All reported concerns will be taken seriously and investigated promptly and impartially. The investigation will be conducted by qualified individuals who are independent of the subject of the report.
- Confidentiality: Confidentiality will be maintained throughout the investigation process, and the identity of the whistle-blower will be protected to the extent possible.

Disclosure of Findings

- Reporting Investigative Outcomes: Upon completion of an investigation, the whistle-blower will be informed of the results, including any actions taken, unless doing so would jeopardize confidentiality or violate the rights of others involved.

Record Keeping and Documentation

- Documentation: All whistle-blower reports and the outcomes of investigations will be documented and retained securely to ensure transparency and accountability.

Monitoring and Review

- Policy Review: This policy will be reviewed annually to ensure its continued effectiveness, relevance, and compliance with applicable laws and regulations.
- Continuous Improvement: Feedback from whistle-blowers and investigative outcomes will be used to improve organizational practices and reinforce the commitment to ethical conduct.

Compliance with ISO 18788 and ICoCA Requirements

This Whistle-blower Policy aligns with ISO 18788, which encourages accountability and ethical practices in security operations, and fulfills the requirements for membership in the International Code of Conduct for Private Security Providers Association (ICoCA).

Whistleblowing Process

1. Accessibility through Publication:

- ✓ Included: The whistleblowing policy is readily accessible and published on our public website to ensure transparency. This allows all stakeholders, including employees and external parties, to understand the reporting process.

2. Hotline for Reporting:

- ✓ Included: We provide a dedicated hotline that is managed by an impartial third party. This arrangement ensures that reports are handled objectively and helps build trust in the reporting process.

3. Anonymity for Whistleblowers:

- ✓ Included: The policy guarantees anonymity for whistleblowers who wish to remain confidential when raising concerns. This protection is crucial in encouraging individuals to report misconduct without fear of retribution.

4. Internal Reporting:

- ✓ Included: Whistleblowers are encouraged to submit their allegations internally through designated channels. This may include reporting to a supervisor, HR representative, or compliance officer, as outlined in the policy.

5. External Reporting:

- ✓ Included: The whistleblowing policy permits whistleblowers to escalate their concerns externally, including to regulators, law enforcement agencies, or other appropriate authorities. This ensures that serious issues can be reported to the relevant entities when necessary.

Whistleblower Policy Support

1. Clear Definition of Whistleblowing:

- ✓ In Place: The policy provides a clear definition of what constitutes whistleblowing, including examples of activities or actions that can be reported.

2. Encouragement of Reporting:

- ✓ In Place: The policy encourages individuals to come forward with their concerns without fear of retaliation, fostering a culture of openness.

3. Anonymity Assurance:

- ✓ In Place: The policy guarantees that whistleblowers can remain anonymous if they choose, protecting their identity throughout the reporting process.

4. Access to Reporting Mechanisms:

- ✓ In Place: Multiple reporting mechanisms are provided, including internal reporting channels and an external hotline managed by an impartial third party.

5. Protection Against Retaliation:

- ✓ In Place: The policy explicitly states that individuals who report in good faith will be protected from retaliation, ensuring they can report concerns safely.

6. Confidentiality of Reports:

- ✓ In Place: Procedures are in place to ensure the confidentiality of reports made under the whistleblower policy.

7. Prompt Investigation Procedures:

- ✓ In Place: The policy outlines procedures for promptly investigating whistleblower reports to ensure timely and fair outcomes.

8. Clear Guidance on How to Report:

- ✓ In Place: The policy provides clear guidance on how to make a report, including all necessary contact details and steps for submission.

9. Periodic Review and Updates:

- ✓ In Place: The whistleblower policy is periodically reviewed and updated to reflect changes in regulations, organizational practices, or feedback from stakeholders.

10. Training and Awareness Programs:

- ✓ In Place: Training programs are conducted to ensure that all employees are aware of the policy and know how to access reporting mechanisms.

11. Follow-Up Communication:

- ✓ In Place: The policy includes provisions for follow-up communication with whistleblowers regarding the status of their reports when possible.

12. Documentation and Record Keeping:

- ✓ In Place: All whistleblower reports and subsequent investigations are documented and maintained for accountability and review purposes.

Conclusion

By implementing this Whistle-blower Policy, Argus Security Company aims to create an environment where individuals feel safe and supported in reporting concerns, fostering a culture of transparency, integrity, and accountability across the organization.



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