

	Business Management System Human Resources Standard Operating Instruction	
	Doc No: GWFS-COR-HR-SOI-003-A1	Date: 02/05/2018
Title: Whistleblowing		

DOCUMENT REVISION CONTROL AND AMENDMENT RECORD

Issue	Change History	Date	Prepared By	Checked By	Approved By
A1	Initial issue	2/5/18	MB	MB	QMRB

TABLE OF CONTENTS

PURPOSE 4
SCOPE 4
INFORMATION 4
REQUIREMENTS..... 5
 GROUND FOR RAISING A CONCERN 5
 WHO TO RAISE A CONCERN WITH 5
 HOW TO RAISE A CONCERN 5
 ETHICS COMMITTEE 5
REFERENCES..... 6

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 SOI applies to all GWFS 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 victimized for using the procedure to raise your concern(s). The Company shall take all reasonable steps to prevent you suffering victimization 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 a member of HR, or you elevate the issue to a member of senior management.

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

GROUNDINGS 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 offense or breach of civil law;
- b. amounts to corruption or fraud;
- c. amounts to a miscarriage of justice;
- d. involves danger to the health and safety of any person;
- e. involves damage or potential damage to the environment; or
- f. 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 ethics hotline +001 571 814 2915 or emailing ethics@garda-federal.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 HR 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.

ETHICS COMMITTEE

15. GWFS has an Ethics & Compliance Committee consisting of the CLO, VP DoS Ops, VP DoD Ops, and Director of HR. Any of these employees can be contacted if needed for any questions regarding your concerns, or to report a violation. The ECC will also decide how the Company shall act in relation to reported incident.

REFERENCE DOCUMENTS

REFERENCES

16. None

ANNEXES

17. None

APPENDICES

18. None

FORMS

19. None