

Grievance & Whistleblower Policy

HR Department

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Revisions

Specify the significance from previous versions of the document

Rev.	Date	Revision Description
00	01/01/2022	Initial release of the document.
01	31/12/2023	Comprehensive review and updates, including layout improvements.
02	31/12/2024	Revisions to align with company standards, enhance document quality, and update layout.



Grievance & Whistleblower Policy

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Grievance & Whistleblower Policy

1. Introduction

Septimius Security is committed to fostering an ethical, transparent, and respectful workplace environment where employees, subcontractors, and external stakeholders can report concerns without fear of retaliation. This policy provides clear guidance for reporting grievances and whistleblower disclosures, ensuring all concerns are addressed fairly, confidentially, and in line with international best practices. This policy applies to all **Septimius Security personnel, subcontractors, and relevant external stakeholders** affected by the company's operations.

2. Objectives

- Provide a fair and transparent process for handling grievances and whistleblower reports.
- Ensure that all complaints are taken seriously, investigated impartially, and resolved efficiently.
- Protect complainants from retaliation and maintain confidentiality throughout the process.
- Encourage ethical conduct, accountability, and compliance with all applicable laws, regulations, and company policies.

3. Scope

This policy covers grievances and whistleblower reports related to:

- Employment concerns, including unfair treatment, discrimination, and workplace harassment.
- Health and safety issues, including breaches of HSE regulations.
- Violations of human rights, unethical conduct, or corruption.
- Violations of company policies, codes of conduct, or operational procedures.
- Any form of misconduct, criminal activity, or legal non-compliance within the company.
- Any other concerns affecting **Septimius Security's** integrity, reputation, or legal obligations.

4. Reporting Mechanisms

4.1. Grievance Reporting (Internal & External Complaints)

Who Can Report:

Employees, subcontractors, and external stakeholders may report grievances through the following channels:

- Direct supervisors or team leaders.
- HR Manager (for internal grievances).



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- Email: hr@septimiussecurity.com
- Physical submission at designated reporting points (HR Office).
- **Septimius Security's** online complaint submission form.

How to Submit a Grievance:

Reports must include:

- Nature of the complaint.
- Date, time, and location of the incident.
- Individuals involved (if applicable).
- Supporting evidence, if available.

Acknowledgment & Processing:

- Complaints will be acknowledged within **72 hours** of submission.
- An **impartial investigator** will be assigned to assess the case within **seven days**.

4.2. Whistleblower Reporting (Confidential & Anonymous Disclosures)

What is Whistleblowing?

Whistleblowing refers to reporting suspected **illegal, unethical, or dangerous activities** affecting the company, its employees, or stakeholders.

Who Can Report?

- Employees (permanent and temporary).
- Subcontractors and suppliers.
- External stakeholders (clients, partners, or affected communities).

How to Report a Whistleblower Concern:

- **Confidential Email:** hr@septimiussecurity.com
- **Anonymous Reporting Form:** Available on the company's website and internal network.
- **In-person submission:** Reports can be made in a sealed envelope addressed to the **HR Manager, General Manager, or CEO**.

Protections for Whistleblowers:

- **Anonymity:** Individuals can report anonymously without revealing their identity.



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- **No Retaliation:** **Septimius Security** strictly prohibits retaliation, discrimination, or any form of victimization against whistleblowers.
- **Confidentiality:** Whistleblower identities and information will be kept confidential unless required by law.
- **Right to External Reporting:** If internal reporting mechanisms fail, whistleblowers may report concerns to regulatory bodies, law enforcement, or oversight organizations.

5. Investigation & Resolution Process

5.1. Step 1: Receipt & Acknowledgment

- Complaints and whistleblower reports are reviewed by the **HR Manager**.
- Acknowledgment is sent to the complainant within **72 hours**.

5.2. Step 2: Investigation

- Investigations begin within **seven days** and involve **gathering evidence, interviewing relevant parties, and assessing compliance** with company policies and laws.
- Investigators may consult legal advisors if required.

5.3. Step 3: Resolution & Corrective Action

- A resolution will be provided within **three months**, including **corrective actions and disciplinary measures (if necessary)**.
- Serious violations may be referred to **legal authorities or regulatory bodies**.

5.4. Step 4: Appeals Process

- If unsatisfied with the resolution, the complainant may escalate the case to the **General Manager or CEO** within **five working days**.
- Appeals will be reviewed and finalized within **ten working days**.

6. Grievance & Whistleblower Protection Measures

- **Protection from Retaliation:** Any act of retaliation against a complainant or whistleblower will result in **disciplinary action**, up to and including **termination**.
- **Fair & Impartial Handling:** All complaints are **investigated without bias** to ensure fairness.



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- **Anonymous Reporting Option:** Whistleblowers may submit reports **anonymously** through the company's secure channels.
- **Legal & Ethical Compliance:** Investigations will follow **legal due process** and **international best practices**.

7. Monitoring, Record Keeping & Reporting

- All **grievances and whistleblower reports, investigations, and resolutions** are documented and securely stored for **legal and compliance** purposes.
- **Trends and patterns** from grievances will be **analyzed periodically** to identify areas for improvement.
- **Summary reports** will be presented to senior management for **continuous improvement and compliance verification**.


8. Awareness & Training

- **Employee Induction Training:** All employees will be informed of **grievance and whistleblowing procedures** upon hiring.
- **Refresher Training:** Periodic training sessions will **reinforce awareness** of the policy.

9. Policy Review & Updates

- This policy will be **reviewed annually** to ensure **alignment with legal requirements and best practices**.
- Feedback from **employees, stakeholders, and audits** will be incorporated into updates.

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