2026

Grievance & Whistleblower Policy

HR Department

Primary contact:

a.alakhdar@septimiussecurity.com

HR-EM-EQO-POL-V1-26
Form Issued Date: 31- December-2025
Form Next Planned Update: 31- December-2026

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 for 2025.
03	31/12/2025	Revisions to align with company standards, enhance document quality, and update layout for 2026.
04	01/04/2026	Document cover pages updated for consistency with current formatting standards.

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1. Introduction

Septimius Security is committed to fostering an ethical, transparent, and respectful workplace 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 accordance with international best practices. It 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 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.
- 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:

- **Email:** info@septimiussecurity.com

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- **Physical Submission:** Written complaints may be submitted at the designated office.
- **Online Complaint Form:** Accessible via the company's internal network.

Required Information:

Grievance reports should include:

- Nature of the complaint
- Date, time, and location of the incident
- Individuals involved (if applicable)
- Any supporting evidence

Acknowledgment & Processing:

- Complaints will be acknowledged within 24 hours of receipt.
- An impartial investigator will be assigned within 7 days to assess and investigate the case.

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, affected communities)

How to Report:

- **Confidential Email:** info@septimiussecurity.com
- **Anonymous Reporting Form:** Available via the company website or internal system
- **Sealed Envelope Submission:** Reports may be submitted in writing using sealed envelopes marked "Confidential"

Protections for Whistleblowers:

- **Anonymity:** Reports can be submitted anonymously.
- **No Retaliation:** Any form of retaliation, discrimination, or victimization is strictly prohibited.

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- **Confidentiality:** Whistleblower identities and related information are kept confidential, unless disclosure is required by law.
- **External Reporting Option:** If internal mechanisms are exhausted or ineffective, whistleblowers may contact external regulatory bodies or oversight authorities.

5. Investigation & Resolution Process

5.1. Step 1: Receipt & Acknowledgment

- Complaints and disclosures are reviewed upon receipt.
- Acknowledgment is sent within 24 hours.

5.2. Step 2: Investigation

- Investigations begin within 2 days.
- The process may include evidence collection, interviews, and consultation with legal or subject matter experts.

5.3. Step 3: Resolution & Corrective Action

- A resolution is issued within 2 weeks, including appropriate corrective or disciplinary measures.
- Serious violations may be referred to legal or regulatory authorities.

6. Grievance & Whistleblower Protection Measures

- **Protection from Retaliation:** Retaliation against any complainant or whistleblower is grounds for disciplinary action.
- **Fair & Impartial Handling:** All cases are addressed objectively and professionally.
- **Anonymous Reporting Option:** Secure, anonymous channels are provided.
- **Legal & Ethical Compliance:** All investigations comply with due process and international standards.

7. Monitoring, Record Keeping & Reporting

- All cases and resolutions are documented and stored securely.
- Data is reviewed to identify trends or systemic issues.
- Summary reports are submitted to senior management to support compliance and continuous improvement.

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8. Awareness & Training

- **Induction:** New employees are informed of grievance and whistleblower procedures during onboarding.
- **Refresher Sessions:** Ongoing training ensures continued awareness of this policy.

9. Policy Review & Updates

- This policy is reviewed annually and updated as needed to reflect changes in legal requirements or company practices.
- Feedback from staff, stakeholders, and audits is incorporated into each review cycle.

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Contact Us

+218 21 711 4727

Libya@septimiussecurity.com

Next to the Peacock Compound, Tajora, Tripoli.

www.septimiussecurity.com