



Whistleblowing Policy

This policy is designed to:

- support our values;
- ensure employees can raise concerns without fear of suffering retribution; and
- provide a transparent and confidential process for dealing with concerns.

This policy not only covers possible improprieties in matters of financial reporting, but also: fraud;

- corruption, bribery or blackmail;
- criminal offences;
- failure to comply with a legal or regulatory obligation;
- miscarriage of justice;
- environmental crime;
- endangering the health and safety of an individual; and
- concealment of any of the above.

Principles

- All concerns raised will be treated fairly and properly.
- We will not tolerate the harassment or victimisation of anyone raising a genuine concern.
- Any individual making a disclosure will retain their anonymity unless they agree otherwise.
- We will ensure that any individual raising a concern is aware of who is handling the matter. • We will ensure no one will be at risk of suffering some form of retribution as a result of raising a concern even if they are mistaken.

We do not however extend this assurance to someone who maliciously raises a matter they know to be untrue. Grievance procedure If any employee believes reasonably and in good faith that malpractice exists in the workplace, then he or she should report this immediately to their own line manager.

However, if for any reason they are reluctant to do so, then they should report their concerns to either the:

- the Control Room; or
- Manager of human resources based at Head Office.

Employees concerned about speaking to another member of staff can speak, in confidence, to an independent third party by calling the whistleblowing hotline.

This is provided through the independent party who provide the employee care counselling and legal advice service.

Your concerns will be reported to CAPITAL SHIELD SECURITY LTD without revealing your identity. If these channels have been followed and employees still have concerns, or if employees feel the matter is so serious that it cannot be discussed with any of the above, they should contact the **ACAS**.

Employees who have raised concerns internally, will be informed of who is handling the matter, how they can make contact with them and if there is any further assistance required. We will give as much feedback as we can without any infringement on a duty of confidence owed by us to someone else.



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Employees' identities will not be disclosed without prior consent. Where concerns are unable to be resolved without revealing the identity of the employee raising the concern, (eg, if their evidence is required in court), we will enter in to a dialogue with the employee concerned as to whether and how we can proceed. If you are unsure whether to use the procedure or you want independent advice at any stage, you may contact ACAS.

Their lawyers can give you free confidential advice at any stage about how to raise a concern about serious malpractice at work. Public Interest Disclosure Act All UK employees will be protected under the Public Interest Disclosure Act 1998, where they make a protected disclosure.

These are disclosures of information, which in the reasonable belief of the employee making the disclosure, cover the following employer activities:

- a criminal offence has been, is being, or is likely to be, committed;
- that a person has failed, is failing or is likely to have failed to comply with any legal obligation to which they are subject;
- a miscarriage of justice has occurred, is occurring or is likely to occur;
- that health and safety of an individual has been, is being or is likely to be endangered;
- that the environment has been, is being or is likely to be damaged; and
- that information relating to the above is being deliberately concealed.

Approved

Managing Director

A handwritten signature in black ink, appearing to be "J. Smith", is written over a horizontal line.

CAPITAL SHIELD SECURITY LTD

This policy is reviewed on 01/01/2026