



POL/030

Integrated Management System

Last Review: 12 May 2025

Next review: 12 May 2026

Whistleblowing Policy

Whistleblowing is the term used when a worker passes on information concerning wrongdoing within their organisation. Wrongdoing may include bullying and harassment, discrimination, unsafe working conditions or practices, unethical behaviour, criminal acts, or any activity connected to modern slavery, including forced labour, human trafficking or exploitation.

Intention of this Policy

At H&M Security Services we are committed to creating an open, transparent and safe working environment where all our employees feel able to speak up if they reasonably believe they are acting in the public interest by raising their concerns, without fear of reprisals, and confident that their concerns will be investigated and dealt with.

This includes concerns relating to modern slavery in any form, whether occurring within our own operations, through suppliers, contractors or other third parties connected to the Company.

Matters covered by this Policy

If an employee believes they have information that one or more of the following has taken place or is going to take place, the employee should follow this Policy to bring it to the Company's attention:

- A criminal offence has been committed, is being committed or is likely to be committed.
- A person has failed, is failing or is likely to fail to comply with any legal obligation to which they are subject.
- A miscarriage of justice has occurred, is occurring, or is likely to occur.
- The health and safety of any individual has been, is being, or is likely to be endangered.
- The environment has been, is being or is likely to be damaged.
- Any practice, behaviour or arrangement that may constitute modern slavery, including forced or compulsory labour, servitude, human trafficking, debt bondage, or exploitation of vulnerable individuals.

It should be emphasised that this Policy is intended to assist employees who believe they have discovered malpractice or impropriety. It is not designed to question financial or business decisions taken by the Company nor is the Policy a channel for employees to raise matters in relation to their terms and conditions of employment. Any matters which relate to an employee personally should be raised using the Company grievance procedure.

All concerns must be raised in good faith. Anyone who abuses the Policy (for example by maliciously raising a concern they know to be untrue) will be subject to disciplinary action.

Process

The most effective way to raise a concern is to do so openly, which makes it easier to assess the concern, investigate where appropriate, to obtain more information if required, and provide feedback on how the matter has been dealt with. However, H&M Security Services understand that in certain circumstances employees may wish to report an issue anonymously, but please bear in mind that this may restrict our ability to look into matters.



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Matters can be reported in total confidence in the first instance to your Line Manager, unless the employee has reasonable grounds to believe that this will result in the concealment of evidence, in which case the employee can report to the Director, and if necessary, to the Managing Director.

Concerns relating to modern slavery will be treated with the utmost seriousness, given the potential risk to individuals' safety and wellbeing.

H&M Security Services will investigate matters, beginning by speaking to you to ascertain the reasons for your belief, and any evidence that you may have. It will then take such steps as are necessary to investigate your concerns, including speaking with other members of staff where necessary.

The Company may seek the right to disclose your name to those persons. You will not have to allow the Company to do this, but where the investigation cannot be properly completed without your consent to do so, you will be informed of this, and the investigation may end at this point. H&M Security Services will, however, do everything possible to investigate any allegations as far as possible, as we take any such allegations very seriously.

You will be kept informed of the progress of the investigations at reasonable intervals. However, the confidentiality that we extend to you may also apply to others, and we may not be able to reveal details of the investigation to you or details of its outcome. Where disciplinary proceedings are issued, you will not be entitled to know the result, as this will be confidential between the Company and the employee concerned.

If disciplinary proceedings result in dismissal, you will be informed. Where the result is an internal sanction, you will not be entitled to know the outcome. Where the matter is handed over to appropriate authorities, we may also be unable to pass on any further information to you, and the decision of the authorities on the matter will be final. H&M Security Services may request an independent professional to investigate matters, particularly in cases involving potential modern slavery where specialist expertise may be required.

Where we feel that your concerns are not substantiated and do not require further action, we will inform you of this and the reasons for it.

Appeal

You may appeal against this decision – whether not to take matters further or where you feel that the action taken does not remedy your concerns – if you have further information you wish H&M Security Services to consider, or where you believe that we have not given sufficient weight to a matter you have already raised. You should do this by letter within five days of being informed of the decision.

The appeal is to the MD, who will meet with you to go over your further concerns. Once this appeal has been dealt with, there will be no further internal appeal. If you obtain any further information at any time, you should bring this to the Company's attention so matters can be considered and investigated. However, if you are not in possession of new matters or information, H&M Security Services will not re-investigate or consider matters a third time.

Protection

You are entitled to be protected from being subjected to any detriment when making a disclosure under this Policy. You will not be subjected to any ill treatment or suffer any detrimental treatment due to making a disclosure. This includes disclosures relating to suspected modern slavery.

If you believe that you are being subjected to such a detriment, you should use the grievance procedure to bring this matter to our attention. Any attempt to misuse this Policy by providing information which the Company has reasonable grounds to believe was not provided in good faith will result in disciplinary proceedings. However, the disclosure of information which you believe, in good faith, to be true will not result



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in disciplinary action if it turns out that the information was incorrect. We would rather hear about matters at an early stage and we require that you have a reasonable ground for your concern.

If this procedure is used in any way to attempt to mislead the Company into disciplining another employee, or is an attempt to take matters about legitimate company issues into your own hands, or to cause general disruption where there is no genuine belief behind your concerns, this will be considered a very serious matter and will result in disciplinary proceedings, and possibly dismissal.

External Authorities

Where your disclosure relates to a possible criminal offence or other similar matter, including suspected modern slavery or human trafficking, then H&M Security Services may need to report it to the appropriate authorities, in which case we may need to reveal your name and the details you have reported. They will then progress the investigation themselves. H&M Security Services will have no further control over this, and all evidence, including yours, will be passed to them.

Whilst the Company will do all it can to protect your confidentiality, where criminal offences or other illegalities are revealed, including modern slavery offences, the proper reporting of these will be the priority for H&M Security Services.

There are other ways, some of which are set out in law, that an employee may make a disclosure without losing their rights under whistleblowing law. One option for external disclosures is prescribed persons. Prescribed persons are mainly regulators and professional bodies. The relevant prescribed person depends on the subject matter of the disclosure; for example, a disclosure about Health & Safety wrongdoing could be made to the Health & Safety Executive, and concerns relating to modern slavery may be raised with bodies such as the police, the Gangmasters and Labour Abuse Authority (GLAA) or other appropriate authorities. You can visit the gov.uk website for a full list of the prescribed people and bodies for whistleblowing purposes.

The ultimate responsibility for this Policy lies with the Managing Director, who ensures that it is given and retains the highest of priorities. This Policy and its implementation will be reviewed at least annually and updated as required.

Signed by:

A handwritten signature in cursive script, appearing to read 'Ian Henderson', written over a horizontal dotted line.

Ian Henderson
Managing Director
H & M Security Services