

# BLACK WOLF WHISTLEBLOWER POLICY

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# WHISTLEBLOWER POLICY

HR-P-WB-25-1

Abstract  
This document must be Read only and COCF form must be signed from all staff members of the company to verify the staff commitment.

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# Black Wolf Security

## 1. Purpose

At Black Wolf for Security and Personal Protection Services Ltd, whistleblowing refers to the act of reporting any concerns about suspected misconduct, illegal actions, or failures to adhere to the company's policies, procedures, and standards. This may be done by employees, contractors, or even the public.

The aim of this policy is to encourage individuals to raise concerns about any aspect of Black Wolf's operations in a confidential and safe manner. Employees often have the earliest insight into issues within an organization, and bringing such concerns forward is seen as a valuable and proactive step toward ensuring the company's continued success and integrity.

Whistleblowing is not considered disloyal but rather a contribution to the ethical standards Black Wolf strives to uphold. We are committed to providing services with the highest possible standards and ethical behavior, and we encourage transparency and freedom of expression to achieve these goals.

If you have concerns, this policy outlines:

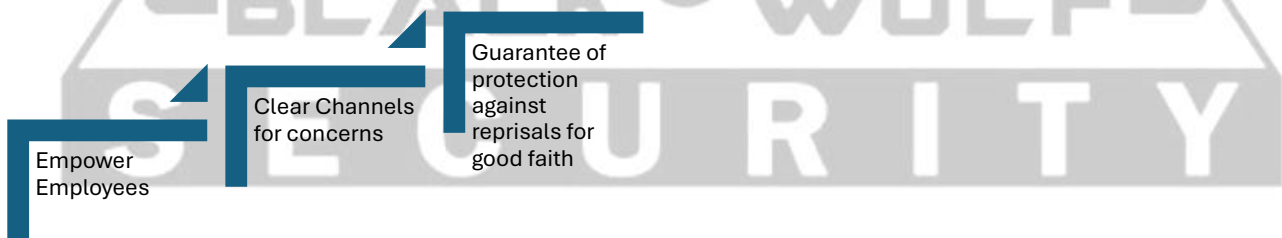
- What issues are appropriate to raise
- How you will be protected from retaliation or discrimination
- How to report concerns
- How Black Wolf will address them

## 2. Application

### 2.1 Purpose

The policy ensures that employees can voice concerns about wrongdoing or malpractice within Black Wolf without fear of retaliation or unfair treatment. It is also intended to encourage individuals to raise concerns internally before resorting to external channels.

Key goals of the policy:



### 2.2 Scope

This policy is meant to address concerns about misconduct or malpractice that may affect the services Black Wolf provides or its employees. It is not meant to replace other processes:

- Employee-related concerns about personal treatment should be addressed with a line manager.

- Client-related service concerns should be directed to Senior Management.
- Misconduct complaints about Black Wolf should follow a separate procedure.

## **2.3 Who Can Raise a Concern?**

This policy applies to all:

- Employees and contractors of Black Wolf
- Clients of Black Wolf
- Service providers under contract with Black Wolf

## **2.4 What Should Be Reported?**

Any serious concern regarding:

- Actions that violate the law or fail to meet legal requirements
- Miscarriages of justice
- Discrimination based on race, gender, disability, etc.
- Public or employee safety issues
- Environmental damage
- Misuse of company funds or assets
- Fraud or corruption
- Abuse or neglect of clients
- Breaches of human rights

This is not an exhaustive list, but it highlights the types of issues that should be reported.

## **3. Protection of the Whistleblower**

### **3.1 Legal Rights**

Workers making disclosures in good faith about public interest concerns are protected under law. Black Wolf adopts these protections to prevent retaliation, such as dismissal or victimization, for those who make a lawful and ethical disclosure. This is important even if an employee may have been involved in the issue raised, as their honesty in coming forward will be considered.

### **3.2 Harassment and Victimization**

Black Wolf is committed to maintaining a positive working environment where concerns can be raised without fear of harassment or retaliation. Any harassment or victimization of a whistleblower will be treated as a serious disciplinary issue.

### **3.3 Support for the Whistleblower**

Throughout the process:

- Senior management will provide support and guidance.
- Your concerns will be taken seriously and investigated thoroughly.

- If necessary, temporary redeployment during the investigation will be considered.

For non-employees, Black Wolf will offer appropriate support and guidance where possible.

### **3.4 Confidentiality**

Concerns will be treated confidentially, and we will take steps to protect your identity, unless legal action requires otherwise. You may be asked to assist further if your disclosure leads to a formal investigation.

### **3.5 Anonymous Allegations**

While this policy encourages individuals to disclose their identity, anonymous concerns may still be considered. However, addressing concerns without knowing the identity of the whistleblower may limit our ability to provide feedback or protect the individual. Black Wolf will assess anonymous reports based on their severity, credibility, and the possibility of verifying the claims.

### **3.6 False Allegations**

If an allegation is found to be false but was made in good faith, there will be no repercussions. However, if an allegation is found to be malicious, frivolous, or made for personal gain, disciplinary action may follow.

## **4. Raising a Concern**

### **4.1 Whom to Contact**

To report a concern, you can reach out to:

[whistleblowing@bw-security.com](mailto:whistleblowing@bw-security.com)

### **4.2 How to Raise a Concern**

When raising a concern, provide the following details:

- Nature of the concern and why it is believed to be true
- Background and context, including relevant dates

While you don't need to prove the concern, you must show reasonable grounds for your belief. You may find it easier to raise a concern with a colleague who shares the same concerns.

### **5. What Happens Next?**

Black Wolf will assess all concerns promptly. Initial inquiries will determine if an investigation is required and how it will proceed. All investigations will be conducted confidentially, though in certain cases, immediate suspension may be necessary for protection.

Within 10 working days, you will receive an acknowledgment and an outline of how the matter will be handled.

### **6. Responsibility**

Senior Management has overall responsibility for maintaining and overseeing this policy.

## **7. Escalating the Matter**

This policy provides an internal mechanism for reporting concerns. However, if you are dissatisfied with the response and feel the matter should be taken further, Black Wolf remains open to external investigations. Note that reporting outside the company may limit the protection offered under this policy.

## **8. Policy Review**

The whistleblowing policy will be reviewed annually to ensure its effectiveness and relevance.

## **9. Recordkeeping and Monitoring**

Senior Management will maintain a register of all concerns raised. The register will be reviewed annually, and a report summarizing the concerns will be made available for internal and external audits. The aim is to ensure lessons are learned and practices are improved, while maintaining confidentiality and data protection.

This policy is a key part of Black Wolf's commitment to transparency, accountability, and the highest ethical standards.

**Yad Mohammed Rashid**

**General Manager**

