



## Whistleblowing & Complaints Policy

### INTRODUCTION

Under certain circumstances, employees are protected from suffering any detriment or termination of employment if they make disclosures about organisations for whom they work. Our values are the standards which we set for ourselves. They are reflected in the culture of our organisation and demonstrated through our behaviour and actions. They influence what we say and do and how we interact with each other, our customers, and those in our care. We all have a responsibility to ensure that we not only uphold these values, but that we also adhere to the law and deliver against the important commitments set out in our code of ethics. In order to ensure that we always 'Act with integrity' and respect, it is critical that we have an effective process in place so that colleagues are able to confidently raise concerns if they believe any behaviours are falling short of our values. Supporting these with effective communications which explain how concerns can be raised, quickly, in confidence and without fear of reprisals, is equally important. If you have concerns about the conduct or behaviour of your colleagues or any wrongdoing by RCG representatives, we strongly urge you to speak up. Wrongdoing may include bullying and harassment, discrimination, unsafe working conditions or practices, unethical behaviour or criminal acts. In reporting your concerns about the conduct or behaviour of your colleagues or any wrongdoing, you will help us to ensure that we all follow our values and continue to develop an open culture at RCG. The RCG Whistleblowing Policy has been made available publicly and information on how to raise concerns with managers or via the appropriate channel this is communicated regularly to every employee, both on joining the company and thereafter on an ongoing basis. We want to ensure that everyone in RCG understands the importance of raising concerns and is confident in doing so. A wide range of channels such as inductions, welcome documentation, notice boards, intranets, websites, values communications materials, training and policy manuals will help to reinforce and remind you of the behaviours which are expected of RCG employees and how to report concerns if you believe the behaviour of others falls short of our values

### QUALIFYING DISCLOSURES

Certain disclosures are prescribed by law as "qualifying disclosures". A "qualifying disclosure" means a disclosure of information that the employee genuinely and reasonably believes is in the public interest and shows that Diligence Security Solutions has committed a "relevant failure" by:

- Committing a criminal offence
- Failing to comply with a legal obligation
- A miscarriage of justice
- Endangering the health and safety of an individual
- Environmental damage
- Concealing any information relating to the above.

These acts can be in the past, present or future, so that, for example, a disclosure qualifies if it relates to environmental damage that has happened, is happening, or is likely to happen. Diligence will take any concerns that you may raise relating to the above matters very seriously.

The Employment Rights Act 1996 provides protection for workers who 'blow the whistle' where they reasonably believe that some form of illegality, injustice or breach of health and safety has occurred or is likely to occur. The disclosure has to be "in the public interest". We encourage you to use the procedure to raise any such concerns.

### THE PROCEDURE

Working together as a team is a core RCG value and we believe that when issues arise, the best way to deal with them is for you to do so with your managers and colleagues and resolve them together constructively. We expect our managers to encourage a culture where you are confident that you may raise concerns without fear of retaliation and that you will be taken seriously. We expect our managers to respond to genuine issues in a constructive way. In the first instance, we encourage you to raise any concerns which you may have through your normal reporting line or HR manager. If for whatever reason, this may be difficult, not appropriate or the person to whom you have reported the matter has not been able to resolve your concern, you can contact RCG anonymously via the RCG website [www.riskconsultancyglobal.com](http://www.riskconsultancyglobal.com)

Once the details of the concern have been logged, the compliance team will assess and respond to your concern, commissioning any necessary investigation in line with RCG international standards. Employees who report concerns are helping us improve how we work and our work environment, uphold our RCG Values and safeguard our reputation. Reporting concerns also helps us to resolve issues early before they develop into a more serious situation. We will ensure that you are supported and not punished in any way for raising a concern. If you raise a concern you will be taken seriously and respected.

RCG does not tolerate retaliation, harassment or pressure by managers or colleagues upon employees who have raised concerns or provided information as part of an investigation. If you raise a concern, you will always be protected by RCG. RCG views any retaliation against those who speak up as a serious disciplinary offence which may result in action up to and including dismissal (in accordance with local laws). Misuse of the whistle blowing service by anyone, or knowingly making false allegations, is also unacceptable and will be treated as a serious disciplinary matter.

Subject to regional legislative restrictions, typical concerns that may be raised include (but are not limited to):

- Breaches of law or regulation
- Breaches of company policies or values
- Unsafe working conditions or health and safety risks
- Bribery or corruption
- Bullying, harassment, discrimination or other inappropriate behaviour
- Criminal offences, violence or threats of violence
- Actions resulting in the violation of an individual's human rights
- Deception of customers or exploitation of customer relationships and/or standards
- Misuse of confidential information
- Fraud or dishonest behaviour
- Falsification, concealment or destruction of financial documents or accounting fraud
- Conflict of interest
- Price fixing, other cartel or anti-competitive activity
- Insider trading

Concerns raised will be assessed by the relevant Regional Ethics Committee and followed up. Where required, an investigator will be appointed to the case who may be internal (but independent of the allegation) or, if appropriate, external to RCG.

Where possible, when raising a concern you will be:

- Thanked, supported and protected
- Advised how your concern will be handled
- Given an estimate of how long the investigation will take
- Advised how to provide further information relevant to the investigation
- Advised, where appropriate, of the outcome of the investigation

- Advised that if you believe you are suffering negative impact for having raised a concern, that you should report this to the chair of the International Ethics Committee by emailing [info@riskconsultancyglobal.com](mailto:info@riskconsultancyglobal.com)

In the first instance you should report any concerns you may have to Human Resources at [HR@riskconsultancyglobal.com](mailto:HR@riskconsultancyglobal.com) or write to Risk Consultancy Global, Office 38, 3a Bridgewater Street Liverpool L1 0AR, 0151 909 2252. Who will treat the matter with complete confidence. If you are not satisfied with the explanation or reason given to you, you should raise the matter with the appropriate official organisation or regulatory body.

### **ANONYMITY AND CONFIDENTIALITY**

The most effective way to raise concern is to do so openly. Openness makes it easier to assess the concern, investigate where appropriate, to obtain more information if required and to provide you with feedback on any matter you raise. However, we understand that in certain circumstances, you may wish to report an issue anonymously. In all circumstances, subject to any legal restrictions, RCG treats all information reported as confidential. In order to fully investigate issues raised and to comply with applicable laws and regulations, certain information relating to the issue will need to be shared on a need to know basis with those investigating the matter. Anyone investigating a report will be required to keep all information confidential. Anyone who raises a concern will be taken seriously and treated with respect. However, any misuse in reporting, such as knowingly making a false allegation, is unacceptable and will be treated as a serious disciplinary matter. While we encourage you to identify yourself so that our investigators can engage with you throughout the process, anonymous calls will be taken equally seriously and investigated as fully as possible. Subject to local legislative restrictions, it is your decision if you choose to remain anonymous and there will never be any attempt by the company to track or covertly discover a whistleblower's identity. However, the effectiveness of any investigation may be limited if you choose not to be identified. Additionally, if we do not know who you are, we will be far less able to protect you.

### **TREATMENT BY OTHERS**

Bullying, harassment, or any other detrimental treatment afforded to a colleague who has made a qualifying disclosure is unacceptable. Anyone found to have acted in such a manner will be subject to disciplinary action.

For and on behalf of Risk Consultancy Global.



Signed

Date: 10/01/2026

Craig Poynton MSc  
Managing Director