

WHISTLEBLOWING POLICY

1. Introduction

Employees / Subcontractors may, whilst carrying out their duties, have access to, or come into contact with, information of a confidential nature. Their terms and conditions provide that except in the proper performance of their duties, employees are forbidden from disclosing, or making use of in any form whatsoever, such confidential information.

However, the law allows employees to make a 'protected disclosure' of certain information. In order to be 'protected', a disclosure must relate to a specific subject matter (clause 2) and the disclosure must also be made in an appropriate way (clause 3). Whistleblowing protection is confined to a disclosure which, in the reasonable belief of the employee making the disclosure, is being made in the public interest.

DSG ("the Company") is committed to compliance with the Bribery Act 2010. The Company actively encourages a culture of honesty and openness and therefore all employees are required to bring to the attention of their manager or other designated person, any issue that, in the employee's opinion, might constitute bribery or corruption.

2. Specific Subject Matter

If, in the course of employment, an employee becomes aware of information which they reasonably believe tends to show one or more of the following:

- 2.1 That a criminal offence has been committed, is being committed or is likely to be committed.
- 2.2 That a person has failed, is failing or is likely to fail to comply with any legal obligation to which he is subject.
- 2.3 That a miscarriage of justice that has occurred, is occurring, or is likely to occur.
- 2.4 That the health or safety of any individual has been, is being, or is likely to be, endangered.
- 2.5 That the environment, has been, is being, or is likely to be, damaged.
- 2.6 That information tending to show any of the above, is being, or is likely to be, deliberately concealed.
- 2.7 That the business or any associated person has been, is being, or is likely to be receiving or offering bribes.
- 2.8 That any foreign official has been, is being, or is likely to be bribed or offered facilitation payment by the company or any associated person.
 - In any of the above cases, the operative must use the Company's disclosure procedure as set out below.

3. Disclosure Procedure

- 3.1 Information which an Operative reasonably believes tends to show one or more of the above should promptly be disclosed to the Managing Director (MD), so that any appropriate action can be taken.
- 3.2 If it is inappropriate to make such a disclosure to the MD, the Operative should speak to their Line Manager.
- 3.3 If the information you wish to discuss or disclose is about the DSG Management Team and or MD, all Operatives and you wish to stay confidential you should use the online portal on the DSG website.
- 3.4 However, failure to follow this procedure may result in the disclosure of information losing its 'protected status.'

4. Confidential ways to contact DSG (24/7)

Online portal on our website www.dsgclosprotection.co.uk which will allow clients, employees and or subcontracted to anonymously leave their concerns and thoughts or alternatively if you wish to be updated, there will be a non-mandatory column to leave your contact details for relevant updates.

A dedicated 24/7, confidential call line is available at Head Office for all operatives who work for DSG to call. This number is 07958048449 and will be left on voice mail to allow anyone to leave any information which they wish DSG to know about.

All calls, messages etc will be treated as confidential with no names or numbers expected or requested from the caller. All information collated from the call line will be managed and investigated by independent personal whom is not part of the management team.

This policy has been approved & authorised by:

Signed by: Julian Roe

Position: Managing Director

Signature:



Date: 01/07/2021

Review Jan 2022