



# GRIEVANCE & WHISTLEBLOWING POLICY

Regis Maritime is committed to the highest standards of openness, probity and accountability. In line with the International Code of Conduct for private security companies, Regis Maritime has established procedures to enable staff or other stakeholders to report any potential violations of the ICoCA or company policies.

## Scope of Policy

This policy is designed to enable employees of the Company and/or external 3rd parties or people to raise concerns internally and at a high level and to disclose information which the individual believes shows malpractice or impropriety. This policy is intended to cover concerns which are in the public interest and may at least initially be investigated separately but might then lead to the invocation of other procedures e.g. disciplinary. These concerns could include but are not limited to:

- ✓ Financial malpractice or impropriety or fraud.
- ✓ Failure to comply with a legal obligation or statutes.
- ✓ Dangers to health, safety, security or the environment.
- ✓ Criminal activity.
- ✓ Improper conduct or unethical behavior.
- ✓ Attempts to conceal any of these.

## Internal Grievances or Concerns (Whistleblowing)

An important aspect of accountability and transparency is a mechanism to enable staff and other members of the Company to voice concerns or grievances in a responsible and effective manner. It is a fundamental term of every contract of employment that an employee faithfully serves his or her employer and not disclose confidential information about the employer's affairs.

Nevertheless, where an individual discovers information which they believe shows serious malpractice or wrongdoing within the organization then this information should be disclosed internally without fear of reprisal, and there should be arrangements to enable this to be done independently of line management (although in relatively minor instances the line manager would be the appropriate person to be told).

The Company has endorsed the provisions set out below to ensure that no members of staff should feel at a disadvantage in raising legitimate concerns.

It should be emphasized that this policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial or business decisions taken by the Company, nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures. Once the "whistleblowing" procedures are in place, it is reasonable to expect staff to use them rather than air their complaints outside the Company.

## Safeguards

### Protection

This policy is designed to offer protection to those employees of the Company who disclose such concerns provided the disclosure is made in good faith and/or in the reasonable belief of the individual making the disclosure that it tends to show malpractice or impropriety and if they make the disclosure to an appropriate person (see below).



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It is important to note that no protection from internal disciplinary procedures is offered to those who choose not to use the procedure. In an extreme case, malicious or wild allegations could give rise to legal action on the part of the people complained about.

## Confidentiality

The Company will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

## Anonymous Allegations

This policy encourages individuals to put their name on any disclosures they make. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of the Company. In exercising this discretion, the factors to be considered will include:

- ✓ The seriousness of the issues raised.
- ✓ The credibility of the concern
- ✓ The likelihood of confirming the allegation from attributable sources.

## Untrue Allegations

If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. In making a disclosure the individual should exercise due care to ensure the accuracy of the information. If, however, an individual makes malicious or vexatious allegations, and particularly if he or she persists with making them, disciplinary action may be taken against that individual.

## External Grievances or Concerns

Any stakeholder, 3rd party or individual who suspects or considers that Regis Maritime may be involved in malpractice or impropriety, may be in breach of ICOCA guidance, government or industry legislation or any other matter they deem worthy of concern is able to report these concerns directly to Regis Maritime in line with this policy.

## Reporting

Regis Maritime will safeguard individuals who make disclosures in good faith. All disclosures will be managed appropriately and in confidence.

All Grievances can be sent to [regis.ops@regismaritime.com](mailto:regis.ops@regismaritime.com). Calls and emails can be anonymous, and every reasonable effort will be made to protect the identity of the caller. The complaints email address is directed at one senior staff member with the responsibility for reviewing grievances.

Alternatively, grievances may be sent directly to the ICOCA. For details of this process please go to:

<https://icoca.ch/registering-a-complaint>



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Appr By: MC

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### Our Commitment

Regis Maritime undertakes to:

Acknowledge receipt of and respond to grievances no later than within 5 working days of receipt.

Investigate allegations promptly, impartially and with due consideration to confidentiality.

Keep records of any such allegations, findings or disciplinary measures. Except where prohibited or protected by applicable law, such records will be made available to a Competent Authority on request.

Cooperate with official investigations, and not participate in or tolerate from their Personnel, the impeding of witnesses, testimony, or investigation.

Take appropriate disciplinary action, which could include termination of employment in case of finding such violations or unlawful behavior.

Ensure that their Personnel who report wrongdoings in good faith are provided protection against any retaliation for making such reports, such as shielding them from unwarranted or otherwise inappropriate disciplinary measures, and that matters raised are examined and acted upon without undue delay.

### Acknowledgement

We will acknowledge receipt of your grievance or complaint within 5 working days of receipt.

### Resolution

Dependent on the nature and detail of the complaint, we will seek to resolve your complaint or grievance and provide you with detailed feedback on any actions we have taken or reasoning behind any action not taken within 30 days of receipt of the grievance or complaint. Should the issue require further investigation and not be resolved in this timeframe, Regis Maritime commit to providing timely updates within the above timelines and provide clear, definitive timelines to you.

**Mark Chaudhary**  
**Managing Director**