



PSS

Power of Sultan Security

Whistleblower Policy

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Power of Sultan Security Services (PSS)

Security Risk Advisory & Consultancy / Travel Risk Management and Secure Movement Services
/ Protective, Static and Site Security Operations / Crisis, Incident and Emergency Response /
ISO-Aligned Compliance and Operational Governance Frameworks

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1 Whistle-blowing Policy Statement

Power of Sultan Security Services and Private Guards Ltd (PSS) is committed to maintaining the highest standards of integrity, transparency, and accountability in all of its operations, including the protection of human rights and the ethical treatment of employees and partners. In line with our compliance to international standards such as ANSI/ASIS PSC.1-2022 (Management System for Quality of Private Security Company Operations), ISO 18788:2015 (Management System for Security Operations), and ISO 9001:2015 (Quality Management Systems), PSS has established this Whistleblower Policy.

This policy is designed to provide an avenue for employees, contractors, vendors, and other stakeholders to report unethical behaviour, illegal activities, or other violations of Company policies or applicable laws, without fear of retaliation.

2 Scope

This policy applies to all employees, subcontractors, and associated personnel working for or on behalf of PSS, including any subsidiaries or affiliates. It covers all activities under PSS operational control, including security services, logistical support, and any other areas of business where ethical standards must be upheld.

3 Safeguarding Whistleblowers

PSS is committed to safeguarding the rights of whistleblowers and will take all reasonable measures to protect their identity, anonymity, and employment status when a report is made in good faith.

Table 1: Whistleblower Safeguards

Safeguards	Desired Outcomes
Confidentiality:	PSS will ensure that any information regarding the whistleblowing process is handled confidentially, and that the identity of the whistleblower is kept confidential to the extent possible.
Non-Retaliation:	PSS has a strict policy against retaliation of any kind. Any employee or associate who makes a report in good faith will not face dismissal, discrimination, harassment, or any other form of retaliation or negative consequence.
Anonymity:	Employees, subcontractors and other stakeholders may choose to report concerns anonymously if they wish, via the Company's designated anonymous reporting channels.

4 Reporting Methods

PSS has established multiple channels for reporting concerns, including but not limited to:

1. **Hotline:** A dedicated telephone number +964 (0) 775 021 7217 for reporting concerns anonymously or directly.

2. **Email:** A confidential email address whistleblower@pss217.com for written reports.
3. **Online Portal:** An online platform will be available through the website for submitting reports <https://pss217.com>
4. **Direct Reporting to Management:** Employees may report concerns directly to their immediate supervisor, department head, or the HR Manager.
5. **External Reporting (if necessary):** In situations where internal reporting channels are not sufficient or appropriate, employees may contact regulatory bodies, law enforcement, or third-party auditors in compliance with local or international law.

5 Potential Areas of Concern

The following are examples of activities or behaviours that should be reported under this policy:

Table 2: Areas of Concern

Areas of concern (AOC)	Descriptions
Corruption or Bribery:	Offering, giving, or receiving bribes or kickbacks.
Fraud:	Misrepresentation of financial, operational, or security-related information.
Violation of Laws:	Any illegal activity, including violations of local or international laws, human rights abuses, or violations of labour laws.
Health and Safety Violations:	Any action or inaction that threatens the health, safety, or well-being of employees, contractors, clients, or the public.
Environmental Concerns:	Actions that cause or could cause harm to the environment in violation of applicable laws or the Company's environmental standards.
Conflict of Interest:	Any personal interest that may interfere with or undermine the impartial performance of duties.
Violation of Company Policies or Code of Conduct:	Any other actions that are in violation of the Company's internal policies, procedures, or ethical guidelines.
Human Rights Violations	Excessive or unlawful use of force, or misconduct during security operations.

6 Investigation of Concerns

Upon receipt of a report PSS will:

1. **Acknowledge Receipt:** The Company will confirm receipt of the whistleblower report within [2] days, unless the report is made anonymously.
2. **Initial Assessment:** A preliminary review will be conducted to assess whether the concern warrants a formal investigation.
3. **Investigation:** If a formal investigation is deemed necessary, the Company will appoint a qualified internal or external investigator, as appropriate, to review the details of the report and gather necessary evidence within [5] days of receiving report.

4. **Action and Resolution:** Once the investigation is complete, the Company will take appropriate corrective actions in accordance with the severity of the issue, which may include disciplinary actions, process improvements, or legal action. The whistleblower will be informed of the outcome, if applicable.

Where appropriate, concerns may also be managed under the Company Grievance Procedure.

7 Roles and Responsibilities

Where a concern involves the Compliance Officer or senior management, reports may be escalated directly to the General Manager.

Table 3: Roles & Responsibilities

Position/Function	Roles & Responsibilities
Employees and Contractors:	All employees and subcontractors are responsible for reporting any concerns or suspected misconduct in accordance with this policy.
Management and Supervisors:	Supervisors and managers are required to ensure that employees are aware of this policy and that they are able to report concerns without fear of retaliation.
Compliance Officer:	The Compliance Officer is responsible for overseeing the implementation of this policy, ensuring proper investigation procedures, and reporting outcomes to senior management.

8 Training and Awareness

PSS will provide regular training to employees on the Whistleblower Policy to ensure they understand how to report concerns, the protections available, and the importance of reporting unethical or illegal activities. New employees will receive training on this policy as part of their onboarding and induction process.

9 Monitoring and Continuous Improvement

To ensure the ongoing effectiveness of this policy, PSS will Regularly review (at least annually) and update the policy to comply with changing laws, regulations, and international standards.

Monitor the use of whistleblowing channels and outcomes of investigations to assess whether any improvements to the system are needed. Encourage open dialogue about ethics and compliance, reinforcing the importance of maintaining a culture of transparency and accountability.

10 Compliance Review

This policy is designed to comply with all applicable local laws and regulations, as well as relevant international standards, including ANSI/ASIS PSC.1-2022, ISO 18788:2015, and ISO 9001:2015.

The Company will review and update this policy as necessary to ensure compliance with all legal requirements and standards.