

smcs:risk

Whistleblower Policy

1. Introduction

1.1 Purpose

To encourage employees to disclose any malpractice or misconduct (whistleblowing) of which they become aware and to provide protection for employees who report allegations of such malpractice or misconduct.

1.2 Scope

The policy applies to all employees including full-time, part-time and temporaries, partners, agents, advisories, contractors, interns and volunteers of SMCS RISK.

1.3 Policy

The whistleblowing policy is designed to encourage employees to report alleged malpractices or misconduct, to ensure that all allegations are thoroughly investigated and suitable action taken where necessary. Any whistleblowing employee is protected against adverse employment actions (discharge, demotion, suspension, harassment, or other forms of discrimination) for raising allegations of employee or business misconduct. An employee is protected even if the allegations prove to be incorrect or unsubstantiated. Employees who participate or assist in an investigation will also be protected. Every effort will be made to protect the identity of the whistleblower; however there may be situations where it cannot be guaranteed.

2. Procedures

2.1 Reporting

This policy advocates an SMCS RISK open door policy and suggests that its managers, officers, and employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. However, any manager, officer, or employee may report wrongful conduct to the Managing Director.

2.2 Investigation

Once the claim of malpractice or misconduct is made, the supervisor or Chief Executive Officer will respond to the whistleblower within 10 working days setting out the intended investigation plan. An investigation may include internal reviews, reviews by external auditors or lawyers or some other external body. Once the investigation is complete, the appropriate company representative will inform the whistleblower of the results of the investigation as well as any corrective steps that are being taken.

2.3 Safeguards

If requested by the whistleblower all reasonable steps will be taken to protect the anonymity of the whistleblower. However under certain circumstances to assist with the investigation the individual's identity may become known or needs to be revealed.

2.4 Disciplinary Action

If the claim of malpractice or misconduct is substantiated, appropriate disciplinary action will be taken against the responsible individual(s) up to and including termination of employment. Any act of retaliation or victimization against the whistleblower will result in disciplinary action, up to and including termination of employment. The malicious use of the whistleblowing policy will result in disciplinary action against the whistleblowing complainant, up to and including termination of employment.

2.5 External Disclosure

Whilst internal disclosure is encouraged at all times an employee may be of the view that there is an exceptionally serious issue, which warrants reporting to an external body. This disclosure must be in good faith and not for the purposes of personal gain.

This Policy was last reviewed in January 2017 and remains enforce until other wise approved by the Chief Executive Officer.