



APOLLO RECRUIT

Whistleblowing Policy

Apollo Recruitment Solutions Ltd

1. Introduction

Apollo Recruitment Solutions Ltd ("the Company") is committed to conducting business with honesty, integrity, and accountability. The Company encourages employees and stakeholders to report any concerns regarding unethical or illegal activities without fear of retaliation. This Whistleblowing Policy outlines how such concerns can be raised and how they will be handled.

2. Purpose

The purpose of this policy is to:

- Provide a safe and confidential channel for reporting concerns.
- Protect whistleblowers from retaliation, discrimination, or victimisation.
- Ensure that concerns are investigated thoroughly and appropriately.
- Promote a culture of integrity and ethical business conduct.

3. Scope

This policy applies to all employees, officers, contractors, consultants, suppliers, and other stakeholders associated with Apollo Recruitment Solutions Ltd.

4. What Can Be Reported?

Whistleblowing concerns may include but are not limited to:

- Criminal activity (e.g., fraud, bribery, corruption, theft, money laundering).
- Violations of laws, regulations, or company policies.
- Health and safety violations.

- Discrimination, harassment, or unethical conduct.
- Financial malpractice or mismanagement.
- Environmental damage.
- Concealment or deliberate failure to address any of the above.

Personal grievances, such as disputes between colleagues, should be addressed through the Company's grievance procedure unless they involve a serious public interest issue.

5. Reporting Process

Employees and stakeholders can report concerns through the following channels:

- **Line Manager:** Report directly to your immediate supervisor if appropriate.
- **HR Department:** Contact the Human Resources department.
- **Whistleblowing Officer:** Report confidentially to the designated Whistleblowing Officer at [Whistleblowing Email/Phone].
- **Anonymous Reporting:** If preferred, concerns can be reported anonymously via [Anonymous Reporting System/External Hotline].

6. Confidentiality and Protection

- Reports will be treated with strict confidentiality, and identities will be protected where possible.
- No employee will suffer retaliation, dismissal, or detrimental treatment for raising a genuine concern in good faith.
- Any act of retaliation, harassment, or victimisation against a whistleblower will result in disciplinary action.

7. Investigation Process

Upon receiving a whistleblowing report:

1. An initial assessment will determine whether an investigation is warranted.
2. If required, an independent investigation will be conducted.
3. Findings will be reviewed by senior management.
4. Appropriate corrective actions will be taken.
5. The whistleblower (if not anonymous) will be informed of the outcome where possible.

8. False or Malicious Reports

Deliberately making false or malicious allegations will be treated as misconduct and may lead to disciplinary action. However, individuals raising genuine concerns, even if mistaken, will be protected.

9. Review and Monitoring

This policy will be reviewed annually by senior management to ensure effectiveness and compliance with legal requirements.

10. Policy Approval

This Whistleblowing Policy is approved by the Directors of Apollo Recruitment Solutions Ltd and is effective from the date of publication.