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## INTEGRATED MANAGEMENT SYSTEMS

Based on ISO 9001, ISO 45001, ISO14001, &ISO18788

### Whistle Blowing Policy

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	DESIGNATION	SIGN	DATE
Prepared by	Head Of Risk & Compliance		15/09/2025
Reviewed by	Chief Operating Officer		15/09/2025
Approved by	Group Chief Executive Officer		15/09/25



AMENDMENT SHEET

Issue/ Revision Number	Subject of amendments	Reviewed by		Authorized by		Date
		Name	Sign	Name	Sign	
May 2024/ 00	Initial issue	-	-	-	-	May 2024
Sep 2025/001	Incorporation of ISO 18788					Sep 2025



**TABLE OF CONTENTS**

<b>CIRCULATION .....</b>	<b>1</b>
<b>AMENDMENT SHEET .....</b>	<b>2</b>
<b>OUR VISION .....</b>	<b>4</b>
<b>OUR MISSION .....</b>	<b>4</b>
<b>OUR CORE VALUES .....</b>	<b>4</b>
<b>WELLS FARGO LIMITED WHISTLE BLOWING POLICY .....</b>	<b>6</b>
Policy Statement.....	6
Purpose and Scope .....	6
Reporting Procedure.....	6
Protection for Whistleblowers .....	6
Investigation and Response .....	7
Confidentiality .....	7
False Reporting .....	7
Compliance with Laws .....	7
Training and Awareness.....	7
Review and Update.....	7
Contact Information .....	7
Non-Retaliation Statement.....	7



## OUR VISION

Our vision is to become the leading protection and security service provider in Eastern Africa. We aspire to set the industry standard for excellence, innovation, and reliability, delivering unparalleled security solutions to our clients across the region.

As the preferred choice for protection and security services, we aim to be recognized for our unwavering commitment to customer satisfaction, our uncompromising adherence to the highest professional and ethical standards, and our ability to consistently exceed expectations.

## OUR MISSION

Our mission is to become the preferred supplier of domestic, corporate, and banking security and protection solutions in Kenya. We are committed to achieving this objective by continuously investing in and developing our resources, including our people, processes, and technology.

We recognize that the security landscape is ever-evolving, and our customers' needs are diverse and dynamic. Therefore, we strive to stay at the forefront of the industry by constantly enhancing our capabilities and adapting to emerging trends and challenges.

## OUR CORE VALUES

### ❖ Focus

We prioritize our clients' security needs by creating tailor-made security solutions to ensure that their assets and personnel are protected. We are dedicated to providing unparalleled security services that meet and exceed our client's expectations.

### ❖ Accountability

We believe in taking responsibility for our actions, decisions, and results. Therefore, operating with transparency, honesty, and integrity in all our interactions with our clients, employees, and stakeholders. Our commitment to accountability ensures that our clients can trust us to always act in their best interests.

### ❖ Reliability

We are committed to delivering reliable security services to our clients. Our experienced and trained security personnel are equipped with the latest technology and techniques to provide comprehensive security solutions that meet and exceed our client's expectations.

### ❖ Growth

We are committed to growing our business by continually improving our security services and expanding our reach. We embrace innovation and adapt to new challenges to achieve our mission and stay ahead of our competitors.



❖ **Organized**

We are a well-organized security company that utilizes a structured approach to manage our clients' security needs. We ensure that our personnel, technology, and processes are coordinated and aligned to deliver the best possible security services to our clients.



## WELLS FARGO LIMITED WHISTLE BLOWING POLICY

### Policy Statement

An important aspect of accountability and transparency is a mechanism to enable staff, stakeholders of Wells Fargo Limited, Fargo Courier Limited and the general public to voice genuine concerns in a responsible and appropriate manner.

Wells Fargo Limited and Fargo Courier Limited ("the Company") is committed to promoting and maintaining high standards of transparency, accountability, ethics and integrity at the service of the Company.

This Policy is designed to support the Company's core values and facilitate reporting of employees' and other parties' concerns about possible improprieties at the earliest opportunity to ensure that concerns can be raised without fear of reprisal or detrimental action.

The procedures contained in this Policy provide a process of managing disclosures of improper conduct that is transparent without compromising the confidentiality of persons involved.

This Policy is adapted to promote alignment with the Witness Protection (Amendment) Act 2010, The Leadership and Integrity Act 2012, and all applicable laws and regulations in Kenya. However, this Policy does not absolve employees and stakeholders from any statutory obligations contained in any Act or Regulation to report criminal offences or breaches of law with the relevant enforcement agencies.

This Policy is to be read together with the Company's Code of Conduct and Ethics and provisions made on code of conduct and disciplinary control in the Company's Human Resource Management Policies and Procedures Manual and other internal, statutory or regulatory reporting procedures

### Purpose and Scope

This policy applies to all employees, contractors, suppliers, and other stakeholders of Wells Fargo Limited.

### Reporting Procedure

- a) Any individual who becomes aware of any illegal, unethical, or improper conduct within Wells Fargo Limited is encouraged to report it promptly. Reports should be made to [speakup@fargo.co.ke](mailto:speakup@fargo.co.ke).
- b) Reports should be made in writing and should include as much detail as possible, including the nature of the concern, relevant dates, names of individuals involved, and any supporting evidence.
- c) Reports can also be made anonymously through [speakup@fargo.co.ke](mailto:speakup@fargo.co.ke).  
Anonymous reports will be treated with utmost confidentiality.

### Protection for Whistleblowers

- a) Wells Fargo Limited is committed to protecting the identity of whistleblowers. All reports will be handled confidentially, and the identity of the whistleblower will be disclosed only on a need-to-know basis or as required by law.



- b) Wells Fargo Limited will not tolerate any form of retaliation against whistleblowers. Any employee found to have retaliated against a whistleblower will be subject to disciplinary action, up to and including termination of employment.

#### Investigation and Response

- a) All reports will be promptly investigated by special operations. The investigation will be conducted impartially, thoroughly, and with due regard for the rights of all parties involved.
- b) Upon completion of the investigation, appropriate action will be taken to address the reported concern. This may include disciplinary action against individuals found to have engaged in illegal, unethical, or improper conduct.

#### Confidentiality

- a) Confidentiality will be maintained throughout the investigation process to the extent possible, consistent with the need to conduct a thorough and effective investigation.
- b) Information related to whistleblower reports will only be disclosed on a need-to-know basis or as required by law.

#### False Reporting

Making false or malicious reports under this policy is strictly prohibited and may result in disciplinary action, up to and including termination of employment.

#### Compliance with Laws

This Whistleblowing Policy is designed to comply with all relevant laws and regulations in Kenya, including but not limited to whistleblower protection laws as may be amended from time to time.

#### Training and Awareness

Wells Fargo Limited will provide training and awareness programs to educate employees and other stakeholders about their rights and obligations under this Policy.

#### Review and Update

This policy will be reviewed periodically to ensure its effectiveness and compliance with relevant laws and regulations. Amendments may be made as necessary.

#### Contact Information

For reporting concerns or seeking clarification on this policy, individuals may contact [Designated Officer/Committee/External Whistleblowing Hotline].

Wells Fargo Limited is committed to fostering a culture of transparency, integrity, and accountability, and encourages all stakeholders to speak up if they become aware of any conduct that violates this commitment.

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#### Non-Retaliation Statement

The Company prohibits retaliation against any individual who, in good faith, reports suspected or actual misconduct. Retaliation against whistleblowers is a violation of company policy and will not be tolerated.



The Company is committed to maintaining a culture of integrity, transparency, and accountability, and encourages all individuals associated with the organization to speak up if they become aware of any behaviour that contradicts these principles.



All employees will be required to sign a non-disclosure agreement (which is included in the appointment letter) as a condition of employment. Employees who improperly use or disclose trade secrets or confidential business information will be subject to disciplinary action, up to and including instant termination of employment and legal action, even if they do not benefit from the disclosed information.