

Danpol Ltd. Anti-Bribery and Corruption (ABC) Policy

Document owner: Daniel Nowakowski, Managing Director

Effective date: 1 December 2025

Next review: 1 December 2026

Applies to: All Danpol Ltd. directors, employees, contractors, agency workers, temporary staff, joint-venture partners, and third parties acting on behalf of Danpol Ltd.

1. Purpose & commitment

Danpol Ltd. operates a zero-tolerance stance toward bribery, corruption, facilitation payments, and any practice that undermines fair competition or public trust. This policy sets out the standards expected under the UK Bribery Act 2010, the Criminal Finances Act 2017, the Procurement Act 2023, and the Common Assessment Standard. It aims to:

- Prevent bribery and corruption risks within UK and international operations, especially across critical national infrastructure sites where Danpol crews mobilise.
- Embed controls that detect, report, and remediate concerns quickly, using digital audit trails, mobilisation dashboards, and senior oversight.
- Protect employees, supply-chain partners, and the communities hosting our projects from legal, financial, and reputational harm.

2. Scope

This policy covers all business dealings, including procurement, mobilisation projects, tendering, sponsorship, donations, gifts and hospitality, community programmes, and interactions with public officials or privately owned enterprises.

3. Definitions

- **Bribe:** Anything of value offered, promised, given, requested, or accepted with the intention of influencing a decision or securing an improper advantage.
- **Facilitation payment:** A small payment made to speed up a routine action. These are prohibited under this policy.
- **Third party:** Any individual or organisation acting on Danpol Ltd.'s behalf, including suppliers, consultants, lobbyists, or joint-venture partners.

4. Roles & responsibilities

- **Board & Managing Director:** Approve and champion the ABC framework, review risk assessments annually, sign this policy, and ensure adequate resources are provided.
- **Mobilisation Governance Team:** Maintain risk registers, deliver due diligence, monitor gifts/hospitality logs, coordinate investigations, and issue annual ABC statements to clients

and frameworks.

- **Line Managers:** Ensure teams complete mandatory training, maintain evidence of communications, and escalate concerns immediately.
- **Employees & contractors:** Read, understand, and comply with this policy; declare conflicts of interest; record all gifts/hospitality; and report concerns without delay.
- **Supply chain partners:** Adhere to this policy through contractual clauses and provide equivalent standards to their employees.

5. Gifts, hospitality, donations & sponsorship

- Modest hospitality that supports legitimate business relationship-building is permissible if it is **proportionate, transparent, pre-approved, and recorded**.
- Cash gifts, cash equivalents (including vouchers), or gifts during tender evaluations are prohibited.
- Charitable donations or sponsorships must be approved by the Managing Director and recorded by Finance, ensuring they are not used to disguise bribery.
- A central **Gifts & Hospitality Register** is maintained in the mobilisation portal. All offers over £50 (or local equivalent) must be logged within two business days, even if declined.
- Construction supervisors must brief subcontractors on site-specific hospitality rules during nightly coordination meetings.

6. Facilitation payments & political contributions

Danpol Ltd. forbids facilitation payments, grease payments, or political contributions of any size. Employees pressured to make such payments must contact the Mobilisation Governance Team immediately and record the incident.

7. Third-party due diligence

- Procurement leads must conduct proportionate due diligence before onboarding suppliers, intermediaries, or consultants. This includes verifying beneficial ownership, sanctions screening, and checking adverse media.
- Higher-risk engagements (e.g., agents dealing with public officials) require enhanced due diligence and written approval from the Managing Director.
- Contracts must contain ABC clauses, audit rights, and termination provisions for breaches.

8. Training & communication

- All new starters complete onboarding modules that cover ABC principles, case studies, and reporting channels.
- Annual refresher training is mandatory for everyone; records are maintained centrally.
- Site managers use toolbox talks, HV-permit briefings, and QR-code posters on welfare units to keep ABC reminders visible on construction compounds.

- Policy updates are communicated via the mobilisation intranet, targeted email briefings, leadership stand-up sessions, and learning management notifications.
- Third parties receive supplier briefings or contractual annexes outlining ABC expectations. Attendance is logged alongside RAMS approvals.

9. Reporting & whistleblowing

- Suspected bribery must be reported immediately to legal@danpol.co.uk, ethics@danpol.co.uk, or through the confidential whistleblowing hotline (+44 1753 773 785, option 4).
- Danpol Ltd. prohibits retaliation against anyone reporting concerns in good faith.
- All allegations trigger an objective investigation led by the Mobilisation Governance Team with Legal oversight. Findings are documented, corrective actions tracked, and relevant authorities notified when required.

10. Record keeping & monitoring

- Finance and project teams must maintain accurate books, records, invoices, and expense claims that reflect transactions truthfully.
- Gifts, hospitality, sponsorship, and donation logs are reviewed quarterly.
- Internal audits test the effectiveness of ABC controls, due diligence, and training completion.

11. Breaches & consequences

Violation of this policy may result in disciplinary action (up to dismissal), contract termination, referral to law enforcement, and civil or criminal penalties. Directors are personally accountable for lapses under the Bribery Act.

12. Review cycle

This policy is reviewed annually or sooner if legislation, client requirements, or risk assessments demand updates. The Managing Director signs and dates the latest version, and the signed PDF is stored in the secure policy vault.

13. Construction mobilisation controls

- **Site access sequencing:** ABC briefings are bundled with RAMS and permit-to-work inductions so every crew member attests to anti-bribery expectations before badge activation.
- **Joint-venture governance:** When Danpol Ltd. partners with tier-one contractors, we align ABC clauses, share gifts/hospitality registers, and perform reciprocal audits.

- **Commercial assurance:** Procurement frameworks (Constructionline, Achilles UVDB, RISQS) require evidence of ABC training, whistleblowing logs, and board oversight. This policy satisfies those evidencing needs.
- **Supplier onboarding:** Construction package orders include ABC questionnaires, sanctions checks, and contract clauses giving Danpol audit and termination rights.

14. Policy communication evidence

- Signed PDF is shared with buyers via secure portals (Constructionline, Achilles) and uploaded to Danpol's document repository.
- Induction packs and staff handbooks reference this policy and require acknowledgment forms that are archived for 7 years.
- Leadership issues quarterly ABC reminders summarising lessons learned, gifts register statistics, and improvement actions.

Signed: *Daniel Nowakowski, Managing Director*

Date: 1 December 2025

Signed on behalf of Danpol Ltd.:

A handwritten signature in black ink, appearing to be 'D. Nowakowski', with a long, sweeping horizontal line extending to the right.

Daniel Nowakowski

Managing Director

Date: 1 December 2025

Digitally signed with authorisation stored in the Danpol policy vault.