

Anti-Slavery & Human Trafficking Policy

Document owner: Managing Director, Danpol Ltd.

Published: 1 December 2025

Applies to: All employees, subcontractors, labour providers, consultants, suppliers, and joint-venture partners.

Review cadence: Annual or sooner if legislation or framework requirements change.

1. Statement

Danpol Ltd. has zero tolerance for modern slavery, human trafficking, forced labour, or servitude. We uphold the UK Modern Slavery Act 2015, Constructionline Common Assessment Standard (CAS) requirements, and all client framework clauses. This policy explains how we prevent, detect, and remediate exploitation across our operations and supply chain.

2. Governance and accountability

- The Managing Director signs this statement and reviews progress each quarter.
- The Mobilisation Governance Team maintains risk assessments, supplier onboarding controls, and training.
- Project leaders ensure site-specific controls (right-to-work checks, worker interviews, and welfare audits) are implemented.
- Suppliers must flow down equivalent standards throughout their own chains.

3. Risk assessment and due diligence

1. **Pre-qualification:** All suppliers complete CAS-aligned questionnaires covering labour sourcing, recruitment fees, and housing arrangements. High-risk categories (e.g., labour-only, accommodation providers) undergo enhanced checks.
2. **Onboarding:** Contracts include anti-slavery clauses, access-to-records rights, and remediation expectations. Right-to-work and identity documentation is verified before mobilisation.
3. **Monitoring:** Site inspections review timesheets, wage evidence, PPE issue logs, and worker interviews. Anonymous channels allow workers to report exploitation without retaliation.
4. **Audits:** We perform targeted audits with clients, councils, or independent specialists where heightened risks are identified.

4. Training and awareness

- Inductions cover warning signs (confiscated documents, debts, restricted movement) and explain reporting routes.
- Procurement, HR, and project managers receive annual refresher training on the Modern Slavery Act and ethical recruitment.

- Posters in multiple languages display hotline details so agency staff and subcontractors understand their rights.

5. Recruitment and labour standards

- Recruitment fees must never be charged to workers. Any breach results in immediate corrective action or removal from our supply chain.
- Wages must meet or exceed UK National Living Wage (or sector-specific agreements) and be paid directly to the worker's bank account.
- Workers must retain their passports and identity documents at all times unless legal requirements dictate secure storage for safekeeping.
- Accommodation standards follow the GLAA (Gangmasters and Labour Abuse Authority) guidance and local authority licensing rules.

6. Reporting and remediation

- Concerns can be reported via the whistleblowing hotline, speakingup@danpol.co.uk, supervisors, or client channels.
- Every report is logged, investigated, and escalated to senior leadership. We cooperate fully with law enforcement and the GLAA.
- Confirmed cases trigger immediate protective steps (removal from risk, welfare support, rehousing) and commercial sanctions against offending parties.

7. Continuous improvement

We benchmark against industry initiatives such as the Supply Chain Sustainability School and Achilles Ethical Business Programme, sharing lessons from each audit round. Metrics (training completion, audits, incidents) are included in quarterly board packs and the annual slavery statement.

Signed on behalf of Danpol Ltd.:



Daniel Nowakowski

Managing Director

1 December 2025

Digitally signed with authorisation stored in the Danpol policy vault.