

Whistleblowing & Speaking Up Policy

Document owner: Managing Director, Danpol Ltd.

Applies to: All employees, agency workers, subcontractors, suppliers, and joint-venture partners.

Published: 1 December 2025

Review cadence: Annual, or sooner if legal or contractual requirements change.

1. Purpose and commitment

Danpol Ltd. relies on transparent reporting to protect people, projects, and the communities we serve. This policy sets out how concerns can be raised about wrongdoing, corrupt activity, unsafe behaviours, or cover-ups without fear of retaliation. It underpins requirements from the UK Public Interest Disclosure Act, the Constructionline Common Assessment Standard (CAS), Achilles UVDB, and client-specific mobilisation frameworks.

2. Scope of disclosures

We encourage disclosures relating (but not limited) to:- Criminal offences, bribery, fraud, or facilitation of tax evasion. - Breaches of legal or contractual obligations, including modern slavery and labour exploitation. - Health, safety, environmental, or security risks likely to cause harm. - Concealment or deliberate suppression of any of the above matters. - Conflicts of interest or unethical behaviour within Danpol or its supply chain.

Concerns about personal employment matters should be routed through the grievance procedure unless they present wider public interest implications.

3. Reporting channels

- **Independent whistleblowing hotline (24/7):** Operated by a certified third party; callers can remain anonymous and still receive a reference number.
- **speakingup@danpol.co.uk (business hours):** Routed to the Mobilisation Governance Team inside an encrypted workspace, with acknowledgement issued within one working day.
- **Direct to Managing Director (by request):** Confidential meetings arranged within 48 hours for sensitive disclosures.
- **Client escalation lines:** Where frameworks demand it, Danpol cooperates with client-led investigations and supplies evidence packages.

Posters at compounds, onboarding packs, and supplier agreements describe these channels so subcontractors and agency workers know how to speak up at any time.

4. Investigation process

1. **Triage:** Governance team logs the concern, applies a reference number, and assesses urgency within 24 hours.

2. **Safeguard:** Confidentiality instructions are issued, records are segregated, and retaliation protections are activated.
3. **Investigation:** A competent manager or independent assessor gathers statements, documents, and digital trail data. Conflicts of interest disqualify investigators.
4. **Outcome:** Findings, corrective actions, and required disclosures (e.g., to regulators or clients) are approved by the Managing Director.
5. **Feedback:** The reporter receives confirmation that the case closed (subject to legal constraints). Lessons learned feed into toolbox talks and policy updates.

5. Protection against retaliation

- Any adverse treatment against a reporter (dismissal, demotion, withheld payment, blacklisting) will be treated as gross misconduct.
- Subcontractor agreements incorporate non-retaliation clauses enforceable via payment retention or termination.
- Danpol funds legal or counselling support for reporters who suffer detrimental treatment linked to a disclosure.
- Anonymous reporting is available for individuals who fear identification; we encourage providing enough detail to enable investigation.

6. Confidentiality and data handling

All records are maintained in a restricted-case management workspace aligned to ISO 27001/27701 controls. Access is limited to investigators, the governance team, and—where required—competent authorities. Data is retained for seven years unless litigation dictates longer storage.

7. Training and awareness

- Induction and annual refresher modules cover whistleblowing obligations and procedures.
- Supervisors receive coaching on how to respond when a concern is raised on site, ensuring statements are captured accurately.
- Supply chain partners confirm policy adoption during onboarding and periodic audits.

8. Review and governance

This policy is reviewed every December or sooner if legislation, client requirements, or serious incident findings demand change. Review evidence (versions, board sign-off, and communications) is logged within the Danpol policy vault.

Signed on behalf of Danpol Ltd.:

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

Daniel Nowakowski

Managing Director

1 December 2025

Digitally signed with authorisation stored in the Danpol policy vault.

Danpol Ltd. | Company No. 10294780 | VAT GB297 8363 45