

1. Purpose & Commitment

DA Pak Ltd is committed to honest, transparent, and responsible business practices. This policy provides a safe and confidential way for employees, contractors, suppliers, and other stakeholders to raise concerns about suspected wrongdoing.

The company encourages reporting of any issues that may harm people, the environment, or society, or constitute illegal, unethical, or unsafe practices, including:

- Misuse of DA Pak products, particularly in sensitive industries.
- Health, safety, or environmental violations.
- Bribery, corruption, fraud, or other illegal activity.

All reports will be treated confidentially, and stakeholders raising concerns in good faith are protected from retaliation.

2. Scope

This policy applies to:

- All employees (permanent, temporary, fixed term)
- Contractors, consultants, volunteers, agency workers, and homeworkers
- Officers, trustees, board members, and committee members
- Third parties (suppliers, agents, distributors) engaged in DA Pak Ltd business

This policy covers concerns in the public interest. Personal employment grievances should follow the company grievance procedure.

3. Reporting Channels

Concerns may be raised through any of the following channels:

- Line Manager or immediate supervisor
- Operations Director or senior management (if reporting to the manager is not possible)
- SHSQ Manager (particularly for environmental, safety, or product misuse concerns)
- Via email to whistleblowing@dapak.co.uk

Stakeholders should provide sufficient details and evidence where possible. All concerns will be investigated promptly, and corrective or remedial action will be taken as needed.

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Anonymous reporting can be made by:

- Submitting a written concern via post without identifying details
- Contacting the company by telephone without providing personal information
- Using email without including identifying information (where appropriate)

While anonymous reports are accepted, providing contact details may assist in conducting a more thorough investigation. All concerns will be treated confidentially regardless of whether the individual chooses to remain anonymous.

4. Investigation Process

A meeting will be arranged to discuss the concern.

Investigations will be conducted by senior management or a designated independent party.

Investigations aim to be fair, consistent, and timely.

Decisions will be communicated to the person raising the concern, including rationale and outcome.

Where appropriate, corrective or remedial action will be taken.

The individual raising the concern will be kept informed of progress and outcomes where appropriate.

5. Protection of Whistleblowers

Individuals raising concerns in good faith are protected from dismissal, disciplinary action, threats, or any other form of retaliation.

Any form of retaliation against a whistleblower will be treated as a serious disciplinary offence and may result in disciplinary action up to and including dismissal.

Where concerns are raised, appropriate measures will be taken to protect the individual, including maintaining confidentiality, limiting information access, and managing any identified risks.

6. Confidentiality

All reports will be handled confidentially.

Information will only be shared with individuals who need to know in order to investigate and resolve the concern.

Where it is necessary to involve additional parties, the individual raising the concern will be informed in advance, and consent will be sought where appropriate.

7. Oversight & Record Keeping

The SHSQ Manager is responsible for maintaining records of all whistleblowing reports and ensuring proper investigation and follow-up.

Documentation will be retained for audit, compliance, and reporting purposes.

8. Communication & Training

The policy will be communicated to all employees, contractors, and relevant third parties.

Training will be provided on:

- How to raise concerns
- Types of issues covered
- Protection and confidentiality measures

9. Alignment with Sensitive Industry Commitments

Concerns regarding misuse of products in sensitive industries will be treated with priority.

All reporting and investigation processes are aligned with DA Pak's Sensitive Industries Commitment Statement and the Sensitive Industry Due Diligence Checklist.

Approved by: Richard Brighton, CEO

Date: 15.04.2026

Contact: SHSQ Manager – 01335 344215