
Whistleblowing Policy

June 2026

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Scope

This policy applies to all employees of Danny Sullivan Group Limited (DSG) and its subsidiaries (Danny Sullivan & Sons Ltd, Diamond Construction & Engineering Recruitment Limited, and Danny Sullivan Group Academy Limited), contractors, workers, agency workers, volunteers and visitors. Danny Sullivan Group and its subsidiaries trust that you and your fellow employees, consultants, contractors, and agency workers will always want to meet the high standards of conduct that we expect from our team. All organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. This policy aims to assist all of us against the harm that risk can cause.

Policy

The purpose of this policy is to provide an internal mechanism for reporting, investigating, and remedying any wrongdoing in the workplace. In most cases, you should not find it necessary to alert anyone externally. We encourage you or others with concerns, particularly relating to financial, governance or regulatory matters, to come forward and express those concerns.

You will find all the key points that we adhere to in this policy, as well as the procedure to follow if you wish to raise a concern under this policy.

If something is troubling you that you think we should know about or investigate, please let us know. If you reasonably believe that the information is true, then you will be covered by the protection set out in this policy regardless of whether you are mistaken, or the matter cannot be proved. If, however, you are aggrieved about your personal situation, please refer to our Grievance Policy.

This policy is reviewed annually by the Company Secretary and will be monitored for compliance by Line Managers/Supervisors within their own area of responsibility and routine audits will be carried out annually. If you have any questions or concerns at any time around any matters covered, or possibly covered, by this policy speak to your manager or if you prefer, to the Company Secretary (in confidence).

The Audit & Risk Committee of Danny Sullivan Group has overall responsibility for this policy and for reviewing the effectiveness of actions taken in response to concerns raised.

This policy does not form part of any contract of employment, and we may amend it at any time.

Who must comply with this policy?

This policy applies to all employees working for Danny Sullivan Group at all levels and also applies to consultants, seconded employees, agency workers, agents, or any other person associated with Danny Sullivan Group, (referred to as “you” in this policy).

What is whistleblowing?

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities, internally or externally as well as illegal acts or omissions at work. This includes bribery, facilitation of tax evasion, fraud or other criminal activity, miscarriages of justice, breach of health and safety disciplines, damage to the environment and any breach of legal or professional obligations.

Raising concerns about wrongdoing can be one of the most difficult and challenging things to do in a work environment. Under this policy you may come forward with concerns where you honestly and reasonably believe that the information is true, without fear of being blamed or suffering any disadvantage for doing so.

This policy should not be used for any complaints relating to your own employment matters or any grievance issues that should be raised under our Grievance Policy found in the Danny Sullivan Group Employee Handbook .

What types of concerns can be raised?

The Public Interest Disclosure Act 1998 (“PIDA”) provides legal protection to you if you reasonably believe that the information you disclose or the allegations that you make are substantially true. PIDA also extends protection given to Health and Safety representatives and to individuals who raise genuine concerns about health and safety and other risks. If you believe that Danny Sullivan Group or an individual has acted or may be acting improperly, you are encouraged to report these concerns, some of which may include an actual or potential:

- Criminal offence that has, is being, or is likely to be committed.
- Bribery, corruption, money laundering or fraud.
- Non-compliance with a legal obligation.
- Unauthorised or inappropriate disclosure, misuse or loss of confidential, personal and/or sensitive information.
- Miscarriage of justice.
- Damage to the environment.
- Danger to the health and safety of employees or others.
- Deliberate concealment of any of the above ; and
- Sexual harassment or any other unwanted conduct of a sexual nature, including conduct that creates a hostile, degrading or humiliating environment, in breach of the Worker Protection (Amendment of Equality Act 2010) Act 2023.

We appreciate that you will sometimes feel worried about possible repercussions. We have a responsibility to ensure that all alleged wrongdoings are fully investigated and that, where appropriate, feedback is provided to you (as the individual who has raised the concern).

No action will be taken against you provided that you reasonably believe the allegation to be true and in the public interest, even if the allegation is not subsequently confirmed by our investigation.

Protection against retaliation

Any employee who raises a genuine concern in good faith under this policy will not be subjected to any detriment, disadvantage, or unfair treatment as a result of doing so. This includes but is not limited to dismissal, demotion, disciplinary action, exclusion, or any change to terms and conditions of employment.

Any individual who retaliates against a whistleblower will be subject to disciplinary action, which may include summary dismissal. Retaliation against a protected whistleblower is itself unlawful under the Public Interest Disclosure Act 1998.

How to raise your concerns

You can raise issues through our independently run whistleblowing service.

AAB Whistleblowing Service details of which are below.

AAB Whistleblowing Service [reporting service](#)

Concerns can be reported through one of the AAB Whistleblowing Service reporting channels, including live telephone reporting, secure web portal or email, which are accessible 24 hours a day, 365 days a year. We will endeavour to maintain confidentiality in respect of all concerns raised and reports can be made anonymously if preferred.

HOW DO I USE THIS SERVICE?

Danny Sullivan Group encourages you to raise concerns internally. However, if for whatever reason, you wish to raise concerns to **AAB** you can do so using the following reporting channels:

- By completing an online web report via the **AAB** website - <https://fileaconcern.org/dannysullivan>
- By ringing your International Toll-free number (ITFN) - 0800 026 0466
- For more information on our services please click on the link to view the **AAB** introduction video

If you are working on a rail project and have concerns regarding issues such as:

- Incorrect PPE Given
- Welfare facilities below expected standard
- Fatigue Concerns
- Non-compliant procedures
- Inadequate Training

You can use CIRAS (an independent, confidential hotline for reporting health & safety concerns and improving welfare in the rail sector)

Telephone: 0800 4 101 101

How does the service work?

Report your workplace concerns AAB Whistleblowing Service using the contact details as follows.

AAB Whistleblowing Service will issue you with a unique reference that allows you to get back in touch with them, update your report, or respond to information requests from even if you have reported anonymously.

AAB Whistleblowing Service will pass the details of your report to whistleblower@dannysullivan.co.uk for investigation (anonymously if preferred).

When reporting your disclosure, you should:

- Provide the nature of your concern, why you believe it to be true, the background and history of the concern (providing relevant dates).
- Make any objections to illegal, unsafe or unethical practices at the earliest opportunity so as to avoid any misunderstanding of the motives for doing so.
- Focus on the issues and report the issues in a clear and concise manner; and be accurate in your observations and keep formal records documenting relevant events.



Russell Deards
General Counsel & Company Secretary
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