DELPHINI LTD

LIFTING, SECURING & SAFETY EQUIPMENT

Policy Pack

November 2026

DELPHINI LTD
LIFTING, SECURING & SAFETY EQUIPMENT

Health, Safety and Welfare

Delphini Ltd recognises that high standards of health, safety and welfare are an integral element of a successful and efficient business.
Therefore, we are committed to providing safe and healthy working conditions in order to prevent work-related injury and ill health associated with Delphini Ltd operations.
Health, Safety and Welfare of our staff is equally as important to the Quality of services delivered to our customers.
As part of our commitment to ISO 45001:2018 we are committed to driving continual improvement from a Health and Safety perspective, and as such have established means of setting clear Health and Safety objectives to demonstrate said commitment.
This statement reaffirms our commitment to fulfil our applicable Legal and other requirements, relevant to Delphini Ltd operations.
In addition to our obligations, we are committed to the elimination of hazards wherever possible, and to reduce exposure to Occupational Health and Safety risks so far as is reasonably practicable.

In addition to the above, we will ensure, so far as is reasonably practicable that: -

- Adequate information, instruction, training, and supervision is to be provided so that through the use of formal risk assessment and the communication of the control measures to be adopted, to eliminate or reduce risk, individuals are made aware of the potential hazards they may face as a consequence of their work and work of others.
- Plant, equipment, and materials provided for work that is to be undertaken will be fit for purpose.
- and adequately maintained so as to be free from unnecessary risk.
- We establish clear means of consulting our workforce on matters of Health and Safety, and that they are actively encouraged to participate in health and safety, raise safety concerns and submit ideas and suggestions for improving standards, thereby facilitating co-operation between individuals, groups, and the management team.
- The immediate and underlying causes of work-related injuries and near misses will be identified and the necessary preventive action implemented to prevent a re-occurrence. This will include, as a last option, the provision and use of the correct personal protective equipment to ensure workers health and safety.
- Health and safety will never be compromised for other company objectives.

This Policy will be reviewed and developed periodically to ensure it remains effective and any necessary amendments will be communicated to all employees.



Dave Cormack
Managing Director
November 2026

DELPHINI LTD
LIFTING, SECURING & SAFETY EQUIPMENT

Worksafe Policy

Delphini Ltd actively encourages any employee or sub-contractor to decline to carry out any working activity, if they feel it is not safe to do so.

Delphini Ltd shall ensure that no employee or sub-contractor shall be penalised for highlighting safety concerns or refusing to work on the grounds of health and safety.

Joint consultation will be held between management and employees including any appointed safety representatives, to resolve any problems which may arise.

Information will be provided to employees on subjects relevant to any consultation that they will be involved with such as the planning of health and safety training; and risk and hazards involved during the course of their work.
To resolve problems both parties, if necessary, will jointly seek expert impartial advice.

Employees who feel that problems are not being satisfactorily resolved by line management should highlight such concerns to a through the normal lines of communications however this does not affect employees' rights to contact the Health and Safety Executive independently.

Consultation will be undertaken if a decision is to be made involving work equipment, processes or organisation that could affect the health and safety of employees. Information will be provided, and a chance will be given to the employees to express their views on the subject. These will all be taken into account before a decision is reached.

If any Delphini Ltd employee or sub-contractor has any concern with regard their health and safety, or that of others, they should inform their manager/supervisor immediately (or as soon as it is safe to do, dependent upon the circumstances) and if he or she is not available, then they must report to an alternative person in authority. The process for dealing with all health and safety concerns is illustrated in the H&S Concerns Flow Chart (HS37).

An employee or sub-contractor could also use a confidential reporting to the HSE on 0300 003 1647 where they deem appropriate action has not been taken by management.



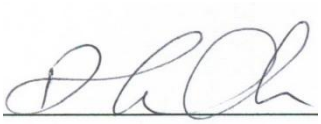
Dave Cormack
Managing Director
November 2026

DELPHINI LTD
LIFTING, SECURING & SAFETY EQUIPMENT

Quality Policy

The company is committed to providing our customers with, on time and a competitive cost, a fault free, sustainable products and reliable service.
Safety plays an increasing vital role in the way companies are managed. In order to maintain profitability and dependability, you require a supplier that understands your individual needs and provides the right products and advise quickly and efficiently.
Delphini can provide the equipment and solutions you need – when you need it – tested, certified equipment that is totally reliable.
We have developed a range of products and services that is ideally suited for the needs of industry. Our workshop and stores, based in Tilbury, can supply, manufacture, and test all types of lifting equipment as well as supply fabrication and machined components.
Our Engineers are fully trained, with many years of experience and are equipped to solve problems on site.
To achieve this, we continually review and improve our management system and its processes. Measurable objectives are set by the management, and it is essential that an effective Quality Assurance system is developed, implemented and constant improvements made to the system which is able to satisfy BS EN ISO 9001:2015, interested parties and our customer requirements.
We understand customer needs and expectations continually change, there for we must work closely with current and potential customers to meet these changes in order to offer suitable products/services ahead of our competition.
The procedures and practices outlined in the Quality Documentation are there for that purpose and to ensure staff understanding of meeting customer, statutory and regulatory requirements.

This is to provide confidence to our customers and therefore the implementation of the Quality Policy is mandatory on all our employees.



David Cormack
Managing Director
November 2026

DELPHINI LTD
LIFTING, SECURING & SAFETY EQUIPMENT

Environmental Policy

Delphini Limited is committed to ensuring, insofar as is reasonably practicable, that its own operations and activities over which it exerts an influence take account of and employ techniques and materials designed not to harm the environment.

In carrying out its working operations Delphini recognises the importance of maintaining and protecting the environment. The company recognises that effective management of our environment makes good business sense and will be a fundamental and integral part of our business strategy.

To ensure we achieve these standards, procedures will be implemented to include the following:

- Being aware of how our activities impact upon the environment particularly climate change and seek to minimise adverse effects by means of the best available techniques, not entailing excessive cost (BATNEEC) or if required by the client BAT (Best Available Technique). This will be achieved through a policy of continual improvement in equipment, site management, the disposal of wastes and general operation of the business.
- Complying with our legal responsibilities and playing our part in influencing future legislation if / when the opportunity arises.
- Conserving the use of resources, particularly those which are scarce or non-renewable, including the following:
- To avoid waste and encourage conservation, re-use and recycling, e.g., chipping, composting and waste disposal management etc.
- To reduce air, land and water pollution, e.g., use of toxic chemicals, motor exhaust etc.
- The choice of materials best suited for a particular use shall be decided upon with due consideration as to the sustainability of their sources.
- Being sensitive to the environmental concerns of our neighbours and the communities through which we operate and responding to them.
- Requiring our suppliers and contractors to have a proper regard for our Environmental Policy for the goods and services they provide for us.
- Communicating this policy to our staff, suppliers, and customers (and any other interested parties, upon request) and seeking their help to implement it.

This policy will be reviewed on an annual basis.



Dave Cormack
Managing Director
November 2026

Counterfeit, Fraudulent & Suspect Items Policy

Introduction

Delphini Ltd is a SME and family company founded in 2001. The company was founded by David Cormack with his father-in-law and father. Both remain an integral part of the business today. Martin Hale is the Financial Director and George Cormack is retained, after retirement as a technical consultant. There are currently three generations of the family working at Delphini Ltd.

Delphini Ltd promotes awareness of the proliferation of counterfeit, fraudulent and suspect items (CFSI) and we are committed to preventing such items getting into our facilities, processes and services.

Counterfeit

Items intentionally manufactured or altered to imitate a legitimate product in order to pass themselves off as genuine. Counterfeit product can be deficient materially or inability to reliably function to the specified conditions.

Fraudulent

Fraudulent items are misrepresented with intent to deceive, including items with incorrect identification or false certifications. They may also include items sold by entities that have acquired the legal right to manufacture a specified quantity of an item but produce a larger quantity than authorized and sell the excess as legitimate inventory.

Suspect

An item about which there is an indication by visual inspection, testing, or other preliminary information that it may not conform to accepted standards, specifications and/or technical requirements and there is a suspicion that the item may be counterfeit, fraudulent, or non-conforming.
Additional information or investigation is needed to determine whether the suspect item is acceptable, non-conforming, counterfeit or fraudulent.

Item

This can be a product and can also be a service.

What can we do?

Our business is based on the safety of the products and services we supply. We understand the legal requirements of compliance and we are committed in providing quality products that are 100% compliant to all UK & EN Regulations.

Supply Chain

We use approved suppliers only and request an EC Declaration of Conformity, material certificates and original manufacturer’s details where possible.

When a specific brand is required, we order direct from the manufacturer or from a known agent.

Delphini Ltd have suitably qualified and experienced staff that will review and verify through inspection, bought in goods before they are sold on or incorporated into a Delphini project or process.

CE Marking

Many of the goods we sell or purchase fall under EC directives and should be CE marked or supplied with an EC Declaration of Conformity.

What is the CE mark?

- Shows the manufacturer has checked that these products meet EU safety, health or environmental requirements.
- Is an indicator of a product's compliance with EU legislation.
- Allows the free movement of products within the European market.

By placing the CE marking on a product, a manufacturer is declaring, on his sole responsibility, conformity with all of the legal requirements to achieve CE marking. The manufacturer is thus ensuring validity for the product to be sold throughout the European Economic Area (EEA). This also applies to products made in third countries which are sold in the EEA and Turkey.

CE marking does not mean that a product was made in the EEA, but states that the product is assessed before being placed on the market.

It means the product satisfies the legislative requirements to be sold there.

It means that the manufacturer has checked that the product complies with all relevant essential requirements, for example health and safety requirements.

If you are a manufacturer, it is your responsibility to:

- Carry out the conformity assessment.
- Set up the technical file.
- Issued the EC Declaration of Conformity (DoC)
- Place the CE mark on the product.

As a distributor we must check the presence of both the CE marking and the necessary supporting EC Declaration of Conformity.

As an importer, importing a product we have to check that the manufacture outside of the EU has undertaken the necessary steps, and check the documentation is available.

Trade Associations

As members of the Lifting Equipment Engineers Association (LEEA) and the International Cargo Handling Co-ordination Association (ICHCA) we can gain and share knowledge of CFSI items.

Each association has direct contact with government executive bodies such as HSE, MCA, Trading Standards as well as other associations, companies and manufacturers. Product warnings must be shared with staff via notice boards, toolbox talks and emails.

Communication with Staff

It is essential that staff recognize and understand the risks associated with CFSI. This document must be available in the staff handbook for reference.

General

We must all be vigilant to the risk of using CFSI and question anything that appears doubtful.

Ensure that the process of initially selecting and approving a supplier is robust.

Apply robust monitoring of the supply chain by documenting non-conformances to ensure continuing understanding and compliance.

Never assume that you will always get the correct product/service, request certification and complete a thorough inspection.

In the event of suspect or counterfeit products being found Delphini shall initiate the non-conformity process as per out Quality Assurance Manual and the items should be quarantined.

The items should be quarantined and not returned to the supplier to prevent them re-entering the supply chain.



Dave Cormack
Managing Director
November 2026

Corporate and Social Responsibility Policy

1. Introduction

Delphini Ltd is a SME and family company founded in 2001. The company was founded by David Cormack with his father-in-law and father. Both remain an integral part of the business today. Martin Hale is the Financial Director and George Cormack is retained, after retirement as a technical consultant. There are currently three generations of the family working at Delphini Ltd.

We believe that the way we do business, based on the values, principles and goals of a family company and the pride we instil on getting things right has been instrumental to our growth and success. We are a small company, but we have the ability and resources to service our contracts, provide personal but professional customer service and have a commitment to safety and quality.

Our business is based on the safety of the products and services we supply. We understand the legal requirements of compliance and we are committed in providing quality products that are 100% compliant to all British Standards and UK & EN Regulations and laws.

Our team is qualified and trained and are a massive part of our on-going success. Our staff and engineers are empowered and encouraged to ensure that jobs are finished on time and safely. We encourage open dialogue between engineers and management and foster an atmosphere where our employees can discuss concerns such as customer service, efficiency and safety.

We also believe that it is essential to build long term partnerships with our suppliers, supporting companies with similar principles as our own.

We support charities and sporting teams that have an impact on our community bringing our name and principles to the community as a whole.

2. Our Values

Our business behaviour is governed by our core values, our values are the basis of our thinking and the way we act. They:

- Make it possible to conduct our business and decide quickly and efficiently with the least possible level of bureaucracy.
- Determine the way we do business, the way we work together and the way we want to be perceived by our surroundings.

Our values are:

Honesty

We are honest by being true to ourselves and approach our surroundings in the same way. We look at our business honestly and ensure that we identify problems so they can be addressed and not hidden.

We respect and work to the laws of the land and understand our position within the community and our responsibility to our shareholders and employees.

Responsibility

We are responsible when acting with respect for the interests of our customers, suppliers, employees, and neighbours. We are always accountable for our actions.

Efficiency

We are efficient by taking the necessary time to plan properly as thorough preparation takes us towards our goals. Once the decision has been taken, we execute fast and communicate accurately.

Pride
We are passionate by believing and taking pride in what we do. We influence our surroundings internally as well as externally by showing that we care about the company, our job, co-workers, and customers.

Professionalism
We are professional in our work and dealings. We will always provide our customers with the best solution taking into consideration regulatory compliance, safety, and service. We will always do what we say and uphold our integrity.

Safety
We will conduct our business to ensure the safety of our employees, customers, and the community as a whole. We will ensure that all regulatory safety and environmental standards are upheld.

The H&S Supervisor / Advisor shall be named as the Social Value Champion (SVC). The responsibilities of the SVC shall include:

- The Values Champions support the rollout and embedding of the company's values and Behaviours.
- Raising awareness of culture and values across the business, the SVC will provide ideas and feedback on values-related development sessions and communication plans; and reflect the needs and experience of site teams on the ground.

3. The Policy

We will uphold our values in all aspects of our business and encourage and train our employees to understand and adopt the company's values.

We recognise that our social, economic and environmental responsibilities to our stakeholders are integral to our business. We aim to demonstrate these responsibilities through our actions and within our corporate policies.

We take seriously all feedback that we receive from our customers and employees and, where possible, maintain open dialogue to ensure that we fulfil the requirements outlined within this policy.

We shall be open and honest in communicating our strategies, targets, performance and governance to our stakeholders in our continual commitment to sustainable development.

We shall provide, and strive to maintain, a clean, healthy and safe working environment. The safety of our employees, customers, and the wider community we affect is paramount.

We are focused on improving the quality of life within our local and wider communities. Integration between Delphini employees and local action/charity groups is actively promoted, along with a broader perspective on our daily actions – business and personal.

We shall strive to improve our environmental performance through implementation of our Environmental policies.

We shall ensure a high level of business performance while minimising and effectively managing risk.

We will register and resolve customer complaints in accordance with our quality plan.

We shall operate an equal opportunities policy for all present and potential future employees.

We will offer our employees clear and fairs terms of employment and provide resources to enable their continual development.

We shall maintain a clear and fair employee remuneration policy and shall maintain forums for employee consultation and business involvement.

We shall provide safeguards to ensure that all employees are treated with respect and without sexual, physical or mental harassment.

We shall uphold the values of honesty, professionalism, and fairness in our relationships.

We will operate in a way that safeguards against unfair business practices through implementation of our Bribery policy.

We shall operate within the law and will not engage in tax evasion or the facilitation of tax evasion in the UK or overseas.

We shall encourage suppliers and contractors to adopt responsible business policies and practices for mutual benefit.

The Directors are responsible for the implementation of this policy and will make the necessary resources available to realise our corporate responsibilities. However, the responsibility for our performance to this policy rests with all employees throughout the company.



Dave Cormack
Managing Director
November 2026

Anti-Bribery Policy

1. Introduction

The Company is committed to the highest standards of ethical conduct and integrity in its business activities in the UK and overseas. This Policy outlines the Company's position on preventing and prohibiting bribery in accordance with the Bribery Act 2010. The Company will not tolerate any form of bribery by, or of, its employees, agents or consultants or any person or body acting on its behalf. Senior management is committed to implementing effective measures to prevent, monitor and eliminate bribery.

2. Scope of this Policy

This Policy applies to all employees and officers of the Company, and to consultants, contractors, and agents acting for, or on behalf of, the Company ("associated persons") within the UK and overseas. Every employee and associated person acting for, or on behalf of, the Company is responsible for maintaining the highest standards of business conduct. Any breach of this Policy is likely to constitute a serious disciplinary, contractual or even criminal matter for the individual concerned and may cause serious damage to the reputation and standing of the Company.

The Company may also face criminal liability for unlawful actions taken by its employees or associated persons under the Bribery Act 2010. All employees and associated persons are required to familiarise themselves and comply with this Policy, including any future updates that may be issued from time to time by the Company.

This Policy covers:

a) The main areas of liability under the Bribery Act 2010;

b) The responsibilities of employees and associated persons acting for, or on behalf of, the Company; and

c) The consequences of any breaches of this Policy.

3. The Bribery Act 2010

The Company is committed to complying with the Bribery Act 2010 in its business activities in the UK and overseas. Under the Act, a bribe is a financial or other type of advantage that is offered or requested with the:

a) Intention of inducing or rewarding improper performance of a function or activity; or

b) Knowledge or belief that accepting such a reward would constitute the improper performance of such a function or activity.

A relevant function or activity includes public, state or business activities or any activity performed during a person's employment, or on behalf of another company or individual, where the person performing that activity is expected to perform it in good faith, impartially, or in accordance with a position of trust.

A criminal offence will be committed under the Act if an employee or associated person acting for, or on behalf of the Company:

a) Offers, promises, gives, requests, receives or agrees to receive bribes; or
b) Offers, promises or gives a bribe to a foreign public official with the intention of influencing that official in the performance of his/her duties (where local law does not permit or require such influence); and The Company does not have the defence that it has adequate procedures in place to prevent bribery by its employees or associated persons.

Prosecution and Penalties

If an individual is found guilty of a bribery offence, tried as a summary offence, they may be imprisoned for up to 12 months and fined up to £5,000. Someone found guilty on indictment, however, faces up to 10 years' imprisonment and an unlimited fine.

The crime of a commercial organisation failing to prevent bribery is punishable by an unlimited fine.

All employees and associated persons are required to comply with this Policy, in accordance with the Bribery Act 2010.

4. What is prohibited?

The Company prohibits employees or associated persons from offering, promising, giving, soliciting or accepting any form of bribe. The bribe might be cash, a gift or other inducement to, or from, any person or company, whether a public or government official, or a private person or company, regardless of whether the employee or associated person is situated in the UK or overseas. The bribe might be made to ensure that a person or company improperly performs duties or functions (for example, by not acting impartially or in good faith or in accordance with their position of trust) to gain any commercial, contractual or regulatory advantage for the Company in either obtaining or maintaining Company business, or to gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

This prohibition also applies to indirect contributions, payments or gifts made in any manner as an inducement or reward for improper performance, for example through consultants, contractors or sub-contractors, advisors, customers, suppliers or other third parties.

5. Records

Employees and where applicable, associated persons, are required to take particular care to ensure that all company records are accurately maintained in relation to any contracts or business activities, including financial invoices and all payment transactions with clients, suppliers and public officials.

Due diligence should be undertaken by employees and associated persons prior to entering into any contract, arrangement or relationship with a potential supplier of services, agent, consultant or representative.

Employees and associated persons are required to keep accurate, detailed and up-to-date records of all corporate hospitality, entertainment or gifts accepted or offered.

6. Corporate Entertainment, Gifts, Hospitality & Promotional Expenditure

6.1 Provision

Principle

The Company permits corporate entertainment, gifts, hospitality and promotional expenditure that is undertaken:

a) For the purpose of establishing or maintaining good business relationships;
b) To improve the image and reputation of the Company or;
c) To present the Company's goods or services effectively

provided that it is:

a) Arranged in good faith, and
b) Not offered or promised to secure an advantage for the Company or any of its employees or associated persons or to influence the impartiality of the recipient.

The Company will authorise only reasonable, appropriate and proportionate entertainment and promotional expenditure.

This principle applies to employees and associated persons, whether based in the UK or overseas.

Procedure

Employees and, where relevant, associated persons should submit requests for proposed hospitality and promotional expenditure well in advance of proposed dates to a Director.

Employees are required to set out clearly:

a) The objective of the proposed client entertainment or expenditure.

b) The identity of those who will be attending.

c) The organisation that they represent; and

d) Details and rationale of the proposed activity.

The Company will approve business entertainment proposals only if they demonstrate a clear business objective and are appropriate for the nature of the business relationship. The Company will not approve business entertainment where it considers that a conflict of interest may arise or where it could be perceived that undue influence or a particular business benefit was being sought for example, prior to a tendering exercise.

If an employee or associated person wishes to provide gifts to suppliers, clients or other business contacts, prior approval from a Director is required, together with details of the intended recipients, reasons for the gift and business objective. These will be authorised only in limited circumstances and will be subject to a cap of £50 per recipient.

The company understands that in certain circumstances low value gifts to customers, whilst in the course of a normal working relationship can occur and are entirely appropriate. Such gifts given out of common courtesy such as water, non-alcoholic beverages, tea, coffee, snacks or similar value items are not considered by the company to be covered by this policy.

Personal Friendships

It is recognised that where a business relationship has developed into a personal friendship, which exists outside the working environment, then personal presents are likely to be exchanged e.g., birthdays, Christmas, retirements. This is permissible provided that:

a) Gifts are paid for by the individual.

b) The employee informs his / her manager.

c) Gifts are not offered or promised to secure an advantage for the Company or any of its employees or associated persons or to influence the impartiality of the recipient.

6.2 Receipt

Principle

The Company permits the acceptance of corporate entertainment, gifts and hospitality within reasonable limits provided that it is:

a) Offered in good faith, and

b) Not accepted in order for the provider to secure an advantage or to influence the impartiality of the recipient.

c) Reported to a director.

6.2.1 Gifts

A gift is defined as any item or goods, or any service, which is provided by a third party for personal benefit at less than its commercial value. The only exceptions to this definition are merchandise samples, which are given to an employee for a bona fide business purpose.

Any gift, reward or entertainment received or offered by clients, public officials, suppliers or other business contacts should be reported immediately to a Director. In certain circumstances, it may not be appropriate to retain such gifts or be provided with the entertainment and employees and associated persons may be asked to return the gifts to the sender or refuse the entertainment, for example, where there could be a real or perceived conflict of interest.

The following types of gifts must not be sought or accepted:

a) Cash, in any currency.
b) Personal gifts received at home or at work.
c) Gifts delivered to a hotel room to "welcome" on arrival.
d) Payment by suppliers to subsidise events or visits.

Exceptions to the above are:

a) Low value "promotional gifts" e.g., calendars, diaries inscribed with the donor's name.
b) Traditional gifts e.g., flowers, fruit and confectionery of a reasonable value during prolonged absence from work, or birth of a child, or wedding etc.
c) Gifts of a reasonable value intended to be shared by staff e.g., confectionery.

6.2.2 Personal Friendships

It is recognised that where a business relationship has developed into a personal friendship, which exists outside the working environment, then personal presents are likely to be exchanged e.g., birthdays, Christmas, retirements. This is permissible provided that:

a) Gifts are paid for by the individual.
b) The employee informs his / her manager.
c) Gifts are not offered or promised to secure or receive an advantage for the Company or any of its employees or associated persons or to influence the impartiality of the recipient.

6.2.3 Travel / Accommodation Expenses

The following may not be accepted:

a) Payment of abnormal business travel / accommodation expenses.
b) Visits to any location when not necessary for a genuine business purpose.
c) Travel / accommodation costs for family members.

6.2.4 Entertainment

The following may not be accepted:

a) Use of donor's property and vehicles unless they are used in the ordinary course of business.

b) Any type of level of entertainment, which is outside the bounds of, accepted business hospitality.

c) Extension of business trips abroad for leisure purposes paid for by the host.

However, entertainment which is within the bounds of accepted business hospitality is acceptable, but permission must be sought by a director prior to attending any such hospitality.

7. Charitable Events

The company understands that entertainment can be offered in the form of organised charitable events. Such events may require sponsorship, donation of gifts and receipt of gifts through raffles, lotteries and auctions.
Involvement of such events by a registered charity is acceptable, however the spirit of this policy should be adopted, and prior approval must be gained from a Director.

Employees and, where relevant, associated persons should submit requests for proposed charitable event expenditure well in advance of proposed dates to a Director.

This policy recognises the hard work of charities and encourages the support of such organisations, but care must be taken to ensure that involvement does not breach this policy.

8. Conflict of Interest

Employees must not directly or indirectly maintain any outside business or financial interest or engage in any outside business or financial activity which conflicts with the interest of the Company, or which interferes with their ability to fully discharge their duties as employees.

Employees are required to disclose in writing to a Director any propriety or other financial interests that they may have in any organisation with which the Company does business with or with which it is in competition within order that a determination may be made as to whether any conflict of interest arises. Reference should also be made to Conditions of Employment.

Employees that deal with outside organisations in the purchase of products, materials or services or who are in a position to influence such purposes should have no propriety or other financial interest either in those organisations furnishing such products, materials, or services or in any transaction for the furnishing of such products, materials or services.

This Policy is not intended to restrict investment or require disclosure of any investment by any employee in shares or any other security of any company listed on the stock

exchange or regularly traded by national securities dealers provided that such investment does not exceed one per cent of the market value of the outstanding securities of such company.

9. Reporting Suspected Bribery

Principle

The Company depends on its employees and associated persons to ensure that the highest standards of ethical conduct are maintained in all its business dealings. Employees and associated persons are requested to assist the Company and to remain vigilant in preventing, detecting and reporting bribery.

Employees and associated persons are encouraged to report any concerns that they may have to a Director as soon as possible. Issues that should be reported include:

a) Any suspected or actual attempts at bribery.
b) Concerns that other employees or associated persons may be being bribed; or
c) Concerns that other employees or associated persons may be bribing third parties, such as clients or government officials.

Procedure

Any concerns should be brought to the attention of a Director to allow employees to record any incidents of suspected bribery. Any such reports will be thoroughly and promptly investigated in the strictest confidence. Employees and associated persons will be required to assist in any investigation into possible or suspected bribery.

Employees or associated persons who report instances of bribery in good faith will be supported by the Company. The Company will ensure that the individual is not subjected to detrimental treatment as a consequence of his/her report. Any instances of detrimental treatment by a fellow employee because an employee has made a report will be treated as a disciplinary offence. An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, employees and associated persons should not agree to remain silent. They should report the matter to a Director.

Action by the Company

The Company will fully investigate any instances of alleged or suspected bribery. Employees suspected of bribery may be suspended from their duties while the investigation is being carried out. The Company will invoke its disciplinary procedures where any employee is suspected of bribery, and proven allegations may result in a finding of gross misconduct and immediate dismissal. The Company may terminate the contracts of any associated persons, including consultants or other workers who act for or on behalf of the Company who are found to have breached this policy.

The Company may also report any matter to the relevant authorities. The Company will provide all necessary assistance to the relevant authorities in any subsequent prosecution.

10. Review of procedures and training

The Company will regularly communicate its anti-bribery measures to employees and associated persons. Refer to the relevant section in the Staff Handbook. The Directors are responsible for the implementation of this policy.

The Directors will monitor and review the implementation of this policy and related procedures on a regular basis, including reviews of internal financial systems, expenses, corporate hospitality, gifts and entertainment policies.

Employees and those working for, or on behalf of, the Company are encouraged to contact a Director with any suggestions, comments or feedback that they may have on how these procedures may be improved.

The Company reserves the right to amend and update this Policy as required.

11. Breach of Policy

Failure to comply with this Policy will constitute a breach of regulations and appropriate disciplinary action may be taken as specified in the Company's Disciplinary Procedures, which may in some instances lead to dismissal.



Dave Cormack
Managing Director
November 2026

Drugs and Alcohol Policy

This statement sets out Delphini's Policy in respect of any employee or contractor carrying out safety critical activities whose proper performance of their duties is or may be impaired as a result of drinking alcohol or taking drugs. Acts of Parliament, Regulations, Codes of Practice, Guidelines and readily available education materials support it including:

Transport and Works Act 1992

Health and Safety at Work etc Act 1974

Road Traffic Act 1988

Misuse of Drugs Act 1971

Management of Health Safety at Work Regulations 1999

Provided that employees and contractors adhere to the provisions of this policy and fully co-operate with the Company's pre-employment, planned, unannounced or "for cause" alcohol and drugs screening arrangements they will normally be able to demonstrate compliance with the above statutory provisions.

Co-operate with the Delphini planned, unannounced or "for cause" alcohol and drugs screening arrangements.

Policy

Delphini will take all reasonable steps to ensure that employees/contractors are made aware of the contents of this statement together with relevant sections of Acts of Parliament and the implications therein. Furthermore, as a reasonable employer we will have in place procedures to prevent, so far as is reasonably practicable, an offence under the above-mentioned Statutory Provisions and a process to measure the effectiveness of such procedures.

It is a requirement that no employee or contractor shall:

Report or endeavour to report for duty having just consumed alcohol or being under the influence of drugs.

Report for duty in an unfit state due to the use of alcohol or drugs,

Be in possession of drugs or alcohol in the workplace, including locker rooms or in vehicles.

Consume alcohol or drugs whilst on duty.

Alcohol Consumption Guideline

The Statutory Guidelines enforced by the Police for the maximum amount of alcohol in the bloodstream is 80mg/100ml of blood.

Prohibited drugs.

Include as a minimum the following drugs or drug groups: -

- Cannabis
- Cocaine
- Amphetamines
- Barbiturates
- Benzodiazephines
- Dextrapropoxyphene
- Methadone
- Opiates

It should also be noted that the abuse of other legal substances such as glue or solvents is prohibited under this Policy.

In addition, many medicines obtained with or without prescription can affect performance at work and employees must not report for duty if affected by such medicines. Examples include Tranquillisers, Sleeping Pills, and Antihistamines for Hay Fever and some cough/cold remedies.

On being prescribed medicines individuals must always seek advice from their doctor as to the effect the medicine may have on their performance. In the case of non-prescribed medicines always read the instructions carefully and seek the advice of a pharmacist.

Employees should contact their manager / Compliance Manager in confidence if they believe they have or are developing alcohol or drugs related problems.

Employees should contact their manager / Compliance Manager in confidence if they believe a work colleague has alcohol or drugs related problems which may compromise safety.

Should an employee be found in breach of this Policy normal disciplinary procedures may result in charges of Gross Misconduct and dismissal. In the case of a “relevant person” who is found to be in breach of this Policy it should be stressed that only in exceptional circumstances will summary dismissal not be applied.

Should subcontractor personnel be found in breach of this Policy the individual will be prohibited from further work with Delphini.

Delphini reserves the right to inform the Police of any such behaviour or of any suspicions in respect of the use or possession of illegal substances.

Any employee who has declared an alcohol or drugs dependency problem will be assisted wherever possible by Delphini to address the problem. However, any such declaration will not confer immunity from disciplinary action for any breach of this Policy.

Any employee / contractor who refuses to take a drug and alcohol test, then the test will be treated as a positive result.



Dave Cormack
Managing Director
November 2026

Infectious Diseases in the Workplace Policy

1. Introduction

The Company has developed this policy on minimising the risk of infectious diseases spreading in the workplace through effective prevention and management.

The policy seeks to ensure that employees are aware of the issues relating to infectious diseases at work and provides guidelines for managers and others on minimising the risk of employees contracting diseases through work and on dealing with infections if contracted. Infectious diseases can be airborne (for example, corona virus, meningitis or TB), blood borne (for example, hepatitis) and faecal oral borne (for example, gastroenteritis).

Infectious diseases that are new and spread quickly may impact on us as individuals, the Company's operations It is important that we take measured and appropriate preventative actions to ensure that we remain safe and well and to ensure business continuity as far as is practicable. In such circumstances, the Company will closely monitor the situation and take appropriate action which may include:

- Working from home where this is practical.
- Self-quarantine in accordance with advice as provided by the Department of Health and the Health Protection Agency.
- Reducing all non-essential travel where possible.

2. Business case

Infectious diseases emerge and spread quickly across the world as a result of global travel and other interconnections. Workplaces are an effective incubator for disease, particularly if hygiene and infection control is poor or if employees go to work when sick.

Infectious diseases can have a potentially significant impact on the business. An employee off sick with a flu-related illness is typically absent for six days; with other viruses such as the corona virus, the period of infection and recovery is longer.

3. Minimising the risk of disease transmission

The Company has a duty of care to maintain a healthy and safe working environment. This includes taking steps to minimise the risk of employees contracting an infectious disease from colleagues and customers.

To this end the Company will:

- Promote awareness and understanding of the issues and concerns relating to the transmission of infectious diseases in the workplace.
- Provide information on the nature and spread of common infectious diseases, including how to identify the symptoms and signs and the procedures to be followed in the event of individual illness or an outbreak affecting a significant number of employees.

4. Standard hygiene practices at work

The Company will develop routine procedures for hygiene control, taking into account professional guidelines and advice from statutory bodies, such as the Department of Health and the Health Protection Agency.

The Company will take steps to raise employees' awareness of these procedures through education, training materials and induction sessions.

Employees are encouraged to adopt effective hand hygiene practices including: Frequently and thoroughly clean hands with an alcohol-based hand sanitizer or, ideally, soap and water. Wash thoroughly for a minimum of thirty seconds.

When coughing and sneezing cover mouth and nose with flexed elbow or tissue – throw tissue away immediately and wash hands.

Avoid touching your eyes, nose or mouth.

Avoid close contact with anyone who has a fever or cough.

If you feel you are suffering from flu-like symptoms such as respiratory symptoms, fever, cough, shortness of breath or breathing difficulties contact your local health advisory service. Seek advice from the NHS advice line on 111.

5. When employees have contracted infectious diseases

Employees with infectious diseases will not be excluded from work, nor have their duties restricted, provided they are physically and mentally fit for work and their continued attendance in the workplace does not present a significant risk of disease transmission to other employees or customers.

The decision as to whether or not an employee with an infection should stay away from the workplace will take into account:

How the infection is transmitted and the ease of transmission.

The typical duration of the infection; and

The potential harm that the infection can cause to other employees and customers.
Employees have a responsibility to minimise the risk of disease transmission to work colleagues and customers and are expected to perform good hygiene control measures and use personal protective equipment where provided.

6. Personal protective equipment

Employees issued with personal protective equipment to minimise the risk of work-related infection should use it appropriately and clean their hands immediately after removing items such as gloves and facemasks.

7. Disease outbreak

In the event of a disease outbreak affecting a significant number of employees, managers and other designated employees will monitor and coordinate activities to control the outbreak. The work of this group will include developing work rules in the event of an outbreak, including exclusions/restrictions from work and the reassignment of duties.



Dave Cormack
Managing Director
November 2026

Equality and Diversity Policy

Delphini is committed to encouraging diversity and eliminating discrimination in both its role as an employer and to support our clients' policies. Delphini aims to create a culture that respects and values each other's' differences, which promotes dignity, equality and diversity, and that encourages individuals to develop and maximise their true potential. We are committed wherever practicable to achieving and maintaining a workforce that broadly reflects the local community in which we operate.

Our policy is designed to ensure that current and potential workers are offered the same opportunities regardless of race, nationality, ethnic origin, age, religion or belief, sex, sexual orientation, marital status, domestic circumstances, disability, pregnancy, gender reassignment, civil partnership or any other characteristic unrelated to the performance of the job. We seek to ensure that no one suffers, either directly or indirectly, as a result of unlawful discrimination. This extends beyond the individual's own characteristics, to cover discrimination by association and by perception.
Delphini will not tolerate discrimination either direct or indirect, which can take different forms, for example:

- treating any individual less favourably than others on grounds of a protected characteristic (sex, race, marital status, religion or belief, sexual orientation, disability, age, pregnancy, gender reassignment or civil partnership)
- expecting a person, solely on the grounds stated above, to comply with requirements that are different to the requirements for others, for any reason whatsoever
- imposing on an individual requirement that are in effect more onerous than they are on others. This would include applying a condition (which is not warranted by the requirements of the position) which makes it more difficult for members of a particular group to comply than others not of that group
- harassment i.e., unwanted conduct which has "the purpose, intentionally or unintentionally, of violating dignity, or which creates an intimidating, hostile, degrading, humiliating or offensive environment" for the individual
- victimisation – i.e., treating a person less favourably because he or she has committed a "protected act". "Protected acts" include previous legal proceedings brought against the employer or the perpetrator, or the giving of evidence at a disciplinary or grievance hearing or at tribunal or making complaints about the perpetrator or the employer or their alleged discriminatory practices.
- discrimination by association, i.e., someone is discriminated against because he/she associates with someone who possesses a protected characteristic
- discrimination by perception, i.e., discrimination on the grounds that the person is perceived as belonging to a particular group, e.g., sexual orientation, religion or belief, irrespective of whether or not this is correct
- any other act or omission of an act, which has the effect of disadvantaging one person against another, purely on the above grounds.

Responsibility for this policy

The Directors have ultimate responsibility for this policy.

The overall responsibility for implementing and monitoring the effectiveness of this policy rests with the Senior Management of Delphini.

Managers and supervisors have a crucial role to play in promoting equality of opportunity in their own areas of responsibility.

All staff, irrespective of their job or seniority, will be given guidance and instruction, through our induction and other training, as to their responsibility and role in promoting equality of opportunity and not discriminating unfairly or harassing colleagues or job applicants, nor encouraging others to do so or tolerating such behaviour. Disciplinary action, including dismissal, may be taken against any employee found guilty of unfair discrimination or harassment.



Dave Cormack
Managing Director
November 2026

Anti-Slavery and Human Trafficking Policy

Slavery is illegal and a violation of human rights. There are many forms of Modern Slavery including forced labour, child labour, exploitation, being controlled by an employer, debt bondage, being physically constrained, being sold or treated as a commodity and having restrictions on freedom of movement. These acts involve a person losing their freedom by being exploited by another for personal or commercial gain.

This company has a zero-tolerance approach to Modern Slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships. We will implement and enforce effective systems and controls to ensure Modern Slavery is not taking place in our own business and supply chains.

We are committed to ensuring our business is transparent, as such we will comply with the disclosure obligations under the Modern Slavery Act 2015.

This company expects our contractors and suppliers to uphold high standards in all business practices; as part of the contracting processes, we include prohibitions against the use of staff sourced from forced, compulsory or trafficked labour, anyone held in slavery or servitude. We expect their suppliers to hold these high standards. We will be auditing our higher risk suppliers, as determined by our predetermined criteria.

This policy applies to all persons working for, or on behalf of this company, in any capacity. This includes but does not limit the policy applicability to, employees, agency workers, temporary staff, agents, contractors, external consultants and third-party representatives. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

All employees are responsible for the prevention, detection and reporting of Modern Slavery in any part of our business or supply chains is. Employees are required to avoid any activity that might lead to a breach of this policy, and the Modern Slavery Act 2015.
You must notify your manager as soon as possible if you believe or suspect that, a conflict with, or breach of, this policy has occurred, or may occur, in the future.
Employees are encouraged to raise concerns about suspicions of Modern Slavery in any parts of our business or supply chains at the earliest possible stage. All employees shall be briefed of this policy/ anonymous reporting procedures during their induction and given an awareness training.
If you are unsure whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply.

Our zero-tolerance approach to Modern Slavery is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them. Suppliers are asked to comply with our Anti-Slavery and Human Trafficking policy from the onset of the relationship.
Suppliers who are unwilling to comply will not be on boarded.
Any employee who breaches this policy will face disciplinary action. This could result in action up to dismissal. We may terminate our relationship with other employees, suppliers and any other associates working with us if they breach this policy.



Dave Cormack
Managing Director
November 2026

Whistleblowing Policy

A whistleblower as defined by this policy is an employee of who reports an activity that he/she considers to be illegal or dishonest to one or more of the parties specified in this Policy. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management are charged with these responsibilities.

Examples of illegal or dishonest activities are violations of legislation, local laws industry standards or other fraudulent financial reporting.

If an employee has knowledge of or a concern of illegal or dishonest fraudulent activity, the employee is to contact his/her immediate supervisor or the Director. The employee must exercise sound judgment to avoid baseless allegations. An employee who intentionally files a false report of wrongdoing will be subject to discipline up to and including termination of employment.

Whistleblower protections are provided in two important areas -- confidentiality and against retaliation and victimisation. Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defence. The Company will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. Any whistleblower who believes he/she is being retaliated against must contact the Director immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

Free, confidential external whistleblowing advice and reporting can be made through **020 3117 2520 or via protect-advice.org.uk**

Employees with any questions regarding this policy should contact the Managing Director or Operations Manager.

Scope and types of reportable concerns

This policy applies to Delphini Limited employees, officers, directors, agency workers, contractors and other workers who raise concerns in the public interest. Reportable concerns include suspected criminal offences; fraud, bribery, corruption or theft; breaches of legal or regulatory obligations; health and safety dangers; environmental damage; miscarriages of justice; deliberate concealment of any of these matters; and serious breaches of company rules or industry standards. Concerns may relate to events that have occurred, are occurring or are likely to occur. Personal employment grievances without a wider public-interest element should normally be raised through the grievance procedure.

Encouragement to speak up

Delphini Limited actively encourages all employees and officers to report genuine concerns promptly, even where they are uncertain whether wrongdoing has occurred. Reports may be made without conclusive evidence, provided there is a reasonable belief that the information tends to show wrongdoing, and disclosure is in the public interest. No one will be penalised for raising a qualifying concern in accordance with applicable law. Knowingly making a malicious or

deliberately false allegation is different from raising a concern in good faith that is not substantiated.

How and where to raise a concern

Concerns should ordinarily be raised with the immediate supervisor, Operations Manager or Managing Director, verbally or in writing. Where the concern involves the supervisor, report directly to the Operations Manager or Managing Director; where it involves one of those persons, report to another uninvolved senior officer. Written reports can be submitted in a sealed envelope marked “Private and Confidential – Whistleblowing” addressed to the Managing Director or Operations Manager at Delphini Limited, Unit 6 Industrial Complex, Tilbury Freeport, Tilbury, Essex, RM18 7HB. Include the nature of the concern, relevant dates, persons involved and any available supporting information. Anonymous reports will be considered, although anonymity may limit investigation or feedback. In an immediate danger, take appropriate emergency action and notify site management without delay.

Handling reports and escalation

The recipient will acknowledge a report where contact details are available, record it securely, assess urgency and potential conflicts of interest, and arrange a proportionate, impartial investigation by an uninvolved person. Information will be shared only on a need-to-know basis. The reporting person will receive appropriate updates and feedback where practicable and lawful. Alleged retaliation must be reported promptly to an uninvolved director or manager and will be investigated separately. Records of concerns, decisions, investigations and outcomes will be kept securely with restricted access in accordance with applicable data protection and retention requirements.

Independent advice and external disclosures

Workers may seek independent confidential advice from Protect using the contact details already provided in this policy. Depending on the nature of the concern, a disclosure to an appropriate prescribed person or regulator may qualify for legal protection where statutory conditions are met; examples include the Health and Safety Executive for relevant safety concerns and the Environment Agency for relevant environmental matters. Protect provides advice and is not itself a statutory regulator. Workers are not required to report internally first where a legally protected external disclosure is appropriate.



Dave Cormack
Managing Director
November 2026

Energy Saving and Energy Awareness Policy

Delphini Limited is committed to saving energy and is fully aware of the impact that fossil fuel energy has on both the environment and our business costs.

In carrying out its working operations Delphini recognise the importance of maintaining and protecting the environment. The company recognises that effective energy management makes good business sense and will be a fundamental and integral part of our business strategy.

To ensure we achieve these standards, procedures will be implemented to include the following:

- Conserving the use of resources, particularly those which are scarce or non-renewable, by;
- Renewing company plant and vehicles to ensure fuel efficiency. This will include site plant that can be electric or hybrid rather than fully petrol/diesel.
- When considering hired in plant, solar and or hybrid plant will be chosen where practical.
- Company vehicle “pooling” and combined vehicle deliveries will be considered on all site jobs to reduce carbon emissions from vehicles.
- Diesel / petrol plant use will be monitored to ensure that engines are not left running unnecessarily.
- Deliveries to our depot / workshop and to customers will be planned to ensure that energy saving is considered, to avoid multiple journeys where unnecessary.
- All office and workshop lighting will be changed to LED and timers will be placed on all lights where possible. Energy suppliers to be green suppliers where possible.
- Nightly energy checking will be put in place to ensure that lights are switched off and that office machines and plant are taken off standby and switched off at the mains when not in use.
- Requiring our suppliers and contractors to have a proper regard for our Energy Saving and Energy Awareness Policy for the goods and services they provide for us.
- Communicating this policy to our staff, suppliers and customers (and any other interested parties, upon request) and seeking their help to implement it.
- Assessing energy consumption and energy costs on a twelve monthly basis to understand the impact of this policy and to identify ways to reduce our energy usage and associated costs.

Dave Cormack
Managing Director
November 2026

Ethical and Sustainable Procurement Policy

Delphini Ltd is committed when purchasing goods and/or services to select those which are produced and delivered without abuse or exploitation of persons involved and have the least negative impact on the environment; as far as is reasonably practicable.

Where a supplier demonstrates evidence of a breach of these conditions then the company will take steps to inform the supplier of the alleged non-conformance and the need to take corrective actions to meet the required conditions; giving a reasonable time deadline for such. Where the supplier fails to meet these requirements within the timescale given then the company will seek an alternative supplier at the earliest possible time.

The ethical codes we require of our suppliers are those we apply within the company and include:

- Employment is freely chosen by the workers involved.
- The supplier recognises the rights, of the workers involved, for freedom of Delphini and collective bargaining.
- The working conditions for the workers are safe and hygienic.
- The supplier pays living wages.
- The working hours are not excessive for those involved.
- The supplier does not practice any form of unlawful discrimination of people.
- Regular employment contracts are given to the workers whenever possible.
- The supplier will not treat others in a harsh or inhumane manner at any time.
- Applicable Labour/Employment Law must be fully adhered to by the supplier.
- Child labour shall not be used by the supplier.
- Undue and unnecessary use of materials by the supplier is avoided.
- Recycled materials will be used by the supplier whenever possible and practicable.
- Steps will be taken by the supplier to conserve scarce resources.
- The supplier will ensure efficient energy use and will minimise harmful emissions.
- The supplier will minimise waste and ensure safe disposal of such.
- The supplier will not act in any way that involves illegal, fraudulent, unprofessional, or corrupt behaviour.

All employees of Delphini Ltd will:

- Declare in advance any interest they may have with any supplier, or bidding supplier, or customer of the company and be prepared to withdraw from those dealings if required.
- Adopt strategies and processes that deliver best value for money in procuring supplies or services; whilst eliminating harm to those people and minimising use of scarce resources and causing harm to environments involved.
- Develop supply relationships that foster mutual understanding and respect of ethical supply chain codes.
- Ensure our supply requirements are specified in such a way as to ensure suppliers are clear about the ethical conditions of the company.
- Act impartially, in a fair and reasonable manner, and comply with applicable legislation, competition and trading best practices and professional behaviour in all supply chain activities.
- Ensure payment for goods and services are made in accordance with the terms agreed, subject to satisfactory supply.
- Comply with information security requirements and sensitivities.

DELPHINI LTD
LIFTING, SECURING & SAFETY EQUIPMENT

Principles and Scope of the Policy

The Board acknowledges they have ultimate responsibility for ensuring that the company has in place a system of appropriate ethical supply chain guidance for staff. This guidance is designed to assist managers and staff involved in the purchasing and delivery of supplies and services.

Key Operational Framework

The company's systems of staff induction and training programmes will include education on this policy; however, no such systems can provide absolute protection against a failure to comply with ethical principles and codes.
The Board is responsible for:

- Ensuring the development and maintenance of effective staff education and guidance to prevent and minimise non-conforming behaviour,
- Ensuring the carrying out of vigorous and prompt investigations if a non-conformance is alleged or found to occur,
- Ensuring appropriate corrective actions are taken to remove or minimise the risks of such behaviour recurring.

Managers should assess the types of supply chain behaviours and risk involved in the operations for which they are responsible; to regularly review and test the communication, education, practice guidance and control systems for which they are responsible; to ensure that controls are being complied with; and to satisfy themselves that their systems continue to operate effectively.



Dave Cormack
Managing Director
November 2026

Anti-Fraud Policy

Delphini maintains a system of internal controls to support achievement of business objectives. This system of controls also aims to prevent fraud. All employees of Delphini have an obligation to adhere to internal control procedures and to observe the Delphini Business Conduct Policy.

Delphini acknowledges that while an adequate system of internal controls will act as a strong deterrent to fraud, there is no guarantee that fraud can always be prevented. Fraud is often found out by accident, for example on investigation of what would otherwise appear to be an insignificant discrepancy. It is Delphini policy, therefore, that the procedure on discovery of fraud should always be followed where fraud is suspected, even if the incident seems relatively insignificant.

This procedure applies and is applicable to all employees and directors of Delphini. Training shall be given on policy during annual policy briefings and/or internal/external training sessions.

1. Definition of fraud

In law, fraud is committed when a person dishonestly makes a false representation, fails to disclose information or abuses a position of trust with intent to gain or cause loss. For practical purposes, fraud may be defined as deliberate misinterpretation which causes loss or damage to Delphini.

2. Roles and responsibilities for detection of fraud

Every member of staff is responsible for the security of Delphini assets, and all staff should be alert to the possibility that unusual eve Delphini or transactions could be symptoms of fraud or attempted fraud. Fraud may also be highlighted as a result of specific management checks or be brought to management's attention by a third party. Additionally, irregularities occasionally come to light in the course of internal or external audit reviews.

3. Procedure on discovery of a fraud

Any employee who believes that they have discovered a fraud must report it immediately. This would normally involve raising the issue with the employee's line manager. However, in circumstances where this is not appropriate, then they should report to the Managing Director directly.

The employee and manager should not discuss the alleged fraud with any other member of staff until the allegation has been investigated. The need for confidentiality is important to:

- avoid alerting the individual(s) involved and providing the opportunity for destruction of evidence;
- ensure that Delphini does not falsely accuse a person or employee of misconduct; and
- manage publicity and protect the Delphini reputation.

The line manager will report the facts of the allegation to the Managing Director, who will determine whether the available information warrants further action. If it does, they will be responsible for:

- agreeing with the Administration Manager how to investigate the allegation further. It may be appropriate for the investigation to be undertaken within the local business stream, or with the involvement of external auditors; and
- taking appropriate steps to freeze relevant transferable assets and prevent destruction of evidence while the allegations are investigated, e.g. by stopping access to bank accounts or suspending members of staff. Suspension at this stage does not imply guilt; it is a safeguard to prevent the removal or destruction of evidence.

The allegation will be investigated promptly, and the investigation fully documented to ensure evidence is available in the event of a subsequent court case or disciplinary procedure.

Free, confidential external whistleblowing advice and reporting can be made through **020 3117 2520 or via protect-advice.org.uk** where all internal reporting has not initiated a thorough investigation and action.

Dave Cormack



Managing Director
November 2026

GDPR / Info Security Policy

Introduction

This information security policy is a key component of Delphini's management framework. It sets the requirements and responsibilities for maintaining the security of information within Delphini. This policy may be supported by other policies and by guidance documents to assist putting the policy into practice day-to-day.

Aim and Scope of this policy.

The aims of this policy are to set out the rules governing the secure management of our information assets by:

- Preserving the confidentiality, integrity and availability of our business information
- Ensuring that all members of staff are aware of and fully comply with the relevant legislation as described in this and other policies.
- Ensuring an approach to security in which all members of staff fully understand their own responsibilities.
- Creating and maintaining within the organisation a level of awareness of the need for information
- Detailing how to protect the information assets under our control.
- This policy applies to all information/data, information systems, networks, applications, locations and staff of Delphini or supplied under contract to it.

Responsibilities

Ultimate responsibility for information security rests with the Managing Director of Delphini, but on a day-to-day basis Remi Abbott shall be responsible for managing and implementing the policy and related procedures.

Responsibility for maintaining this Policy, the business Information Risk Register and for recommending appropriate risk management measures is held by Remi Abbott.

Both the Policy and the Risk Register shall be reviewed by Company Board members at least annually.

Line Managers are responsible for ensuring that their permanent staff, temporary staff and contractors are aware of:

- The information security policies applicable in their work areas
- Their personal responsibilities for information security
- How to access advice on information security matters

All staff shall comply with the information security policy and must understand their responsibilities to protect the company's data. Failure to do so may result in disciplinary action.

Line managers shall be individually responsible for the security of information within their business area.

Each member of staff shall be responsible for the operational security of the information systems they use.

Each system user shall comply with the security requirements that are currently in force, and shall also ensure that the confidentiality, integrity and availability of the information they use is maintained to the highest standard.

Access to the organisation's information systems by external parties shall only be allowed where a contract that requires compliance with this information security policy is in place. Such a contract shall require that the staff or sub-contractors of the external organisation comply with all appropriate security policies.

Legislation

Delphini is required abide by certain UK, European Union and international legislation. It also may be required to comply to certain industry rules and regulations.
The requirement to comply with legislation shall be devolved to employees and agents of the Delphini, who may be held personally accountable for any breaches of information security for which they are responsible.
In particular, Delphini is required to comply with:

The Data Protection Act (1998)

The Data Protection (Processing of Sensitive Personal Data) Order 2000.

The Copyright, Designs and Patents Act (1988)

The Computer Misuse Act (1990)

The Health and Safety at Work Act (1974)

Human Rights Act (1998)

Regulation of Investigatory Powers Act 2000

Freedom of Information Act 2000

General Data Protection Regulations 2018

Personnel Security

Contracts of Employment
Staff security requirements shall be addressed at the recruitment stage and all contracts of employment shall contain a security and confidentiality clause.

References for new staff shall be verified and a passport, driving license or other document shall be provided to confirm identity.

Information security expectations of staff shall be included within the employee's induction and signed by each member of staff accessing Delphini's information and systems.

Whenever a staff member leaves the company, their accounts will be disabled the same day they leave.

Information Security Awareness and Training
The aim of the training and awareness programmes are to ensure that the risks presented to information by staff errors and by bad practice are reduced.

Information security awareness training shall be included in the staff induction process and shall be carried out annually for all staff who access Delphini's systems.

An on-going awareness programme shall be established and maintained in order to ensure that staff awareness of information security is maintained and updated as necessary.

Intellectual Property Rights
The organisation shall ensure that all software is properly licensed and approved by Remi Abbott or any Company Director.

Individual and Delphini intellectual property rights shall be protected at all times.

Users breaching this requirement may be subject to disciplinary action.

Access Management

Physical Access
Only authorised personnel who have a valid and approved business need shall be given access to areas containing information systems or stored data.

Identity and passwords
All passwords must offer an adequate level of security to protect systems and data as a minimum all passwords shall be ten characters or longer and contain at least two of the following: uppercase letters, lowercase letters and numbers.

All passwords including administrator-level shall be changed at least every 90 days and where available, two-factor authentication shall be used to provide additional security.

All users shall use uniquely named user accounts and generic user accounts that are used by more than one person or service shall not be permitted for use.

User Access
Access to information shall be based on the principle of “least privilege” and restricted to authorised users who have a business need to access the information. New user accounts can only be set up after authorised from a Company Director.

All company computers will only have the required user accounts active on each machine all accounts which are not required for use by the company will be removed, such as guest accounts.

Administrator-level access
Administrator-level access shall only be provided to individuals with a business need who have been authorised by Remi Abbott.

A list of individuals with administrator-level access shall be held by Remi Abbott and shall be reviewed every 6 months.

Administrator-level accounts shall not be used for day-to-day activity. Such accounts shall only be used for specific tasks requiring administrator privileges. 2 factor authentication shall be used for all administrator level passwords.

Administrator level accounts will not be used for email or for accessing the internet for web browsing.

Application Access
Access to data, system utilities and program source libraries shall be controlled and restricted to those authorised users who have a legitimate business need e.g., systems or database administrators.

Authorisation to use an application shall depend on a current licence from the supplier and approval from the appropriated divisional director.

Hardware Access
Access to the network shall be restricted to authorised devices only.

System Perimeter access (firewalls)
The boundary between business systems and the Internet shall be protected by firewalls, which shall be configured to meet the threat and continuously monitored.

All servers, computers, laptops, mobile phones and tablets shall have a firewall enabled, if such a firewall is available and accessible to the device's operating system.

The default password on all firewalls shall be changed to a new password that complies to the password requirements in this policy and shall be changed regularly.

All firewalls shall be configured to block all incoming connections.

If a port is required to be opened for a valid business reason, the change shall be authorised by Remi Abbott. The port shall be closed when there is no longer a business reason for it to remain open.

Monitoring System Access and Use
An audit trail of system access and data use by staff shall be maintained wherever practical and reviewed on a regular basis by the system administrator.

The business reserves the right to monitor and systems or communications activity where it suspects that there has been a breach of policy in accordance with the Regulation of Investigatory Powers Act (2000).

Asset Management

Asset Ownership
Each information asset, (hardware, software, application or data) shall have a named custodian who shall be responsible for the information security of that asset.

Asset Records and Management
An accurate record of business information assets, including source, ownership, modification and disposal shall be maintained.

All data shall be securely wiped from all hardware before disposal.

Asset Handling
Delphini shall identify particularly valuable or sensitive information assets through the use of data classification.

All staff are responsible for handling information assets in accordance with this security policy. Where possible the data classification shall be marked upon the asset itself.

All company information shall be categorised into one of the three categories in the table below based on the description and examples provided:

Category	Description	Example
Public	Information which is not confidential and can be made available publicly through any channels.	Details of products and services on the website Published company information. Social media updates Press releases
Amber Information	Information which, if lost or made available to unauthorised persons could impact the company's effectiveness, benefit competitors or cause embarrassment to the organisation and/or its partners	Company operating procedures and policy Client contact details Company plans and financial information. Basic employee information including personal data
Red Information	Information which, if lost or made available to unauthorised persons, could cause severe impact on the company's ability to operate or cause significant reputational damage and distress to the organisation and/or its partners. This information requires the highest levels of protection of confidentiality, integrity and availability.	Client intellectual property Data in e-commerce systems Employee salary details Any information defined as "sensitive personal data" under the Data Protection Act

Removable media
Only company provided removable media (such as USB memory sticks and recordable CDs/DVDs) shall be used to store business data and its use shall be recorded (e.g., serial number, date, issued to, returned)

Removable media of all types that contain software or data from external sources, or that has been used on external equipment, require the approval of Remi Abbott before they may be used on business systems. Such media must be scanned by anti-virus before being used.

Auto play functionally on all system PCs shall be disabled by means of group policies from the central sever.

Users breaching these requirements may be subject to disciplinary action.

Mobile working
Where necessary, staff may use company-supplied mobile devices such as phones, tablets and laptops to meet their job role requirements.

Use of mobile devices for business purposes (whether business-owned or personal devices) requires the approval of Remi Abbott

Such devices must have anti-malware software installed (if available for the device), must have PIN, password or other authentication configured, must be encrypted (if available for the device) and be capable of being remotely wiped.

They must also comply with the software management requirements within this policy.

Users must inform Remi Abbott or a Company Director immediately if the device is lost or stolen and business information must then be remotely wiped from the device.

Personal devices / Bring Your Own Device (BYOD)
Where necessary, staff may use personal mobile phones to access business email. This usage must be authorised by Remi Abbott.
The device must be registered in the asset records and must be configured to comply with the mobile working section and other relevant sections of this policy.

No other personal devices are to be used to access business information.

Social Media
Social media may only be used for business purposes by using official business social media accounts with authorisation from Remi Abbott. Users of business social media accounts shall be appropriately trained and be aware of the risks of sharing sensitive information via social media.

Business social media accounts shall be protected by strong passwords in-line with the password requirements for administrator accounts.

Users shall behave responsibly while using any social media whether for business or personal use, bearing in mind that they directly or indirectly represent the company. If in doubt, consult Remi Abbott.

Users breaching this requirement may be subject to disciplinary action.

Physical and Environmental Management

In order to minimise loss of, or damage to, all assets, equipment shall be physically protected from threats and environmental hazards. Physical security accreditation should be applied if necessary.
Systems shall be protected from power loss by UPS systems designed to support critical equipment.

Systems requiring particular environmental operating conditions shall be maintained within optimum requirements.

Computer and Network Management

Operations Management
Management of computers and networks shall be controlled through standard documented procedures that have been authorised by the board of directors.

System Change Control
Changes to information systems, applications or networks shall be reviewed and approved by Remi Abbott

Accreditation
The organisation shall ensure that all new and modified information systems, applications and networks include security provisions to comply with policy.

They must be correctly sized, identify the security requirements, be compatible with existing systems according to an established systems architecture (as required) and be approved by Remi Abbott before they commence operation. Implemented

Software Management

All application software, operating systems and firmware shall be updated on a regular basis to reduce the risk presented by security vulnerabilities.

All software security updates/patches shall be installed within 7 days of their release.

Only software which has a valid business reason for its use shall be installed on devices used for business purposes.

Users shall not install software or other active code on the devices containing business information without permission from Remi Abbott.

For the avoidance of doubt, all unnecessary and unused application software shall be removed from any devices used for business purposes.

Local Data Storage
Data stored on the business premises shall be backed up regularly and restores tested at appropriate intervals (at least monthly).

A backup copy shall be held in a different physical location to the business premises using an online backup service.

Backup copies of data shall be protected and comply with the requirements of this security policy and be afforded the same level of protection as live data.

External Cloud Services
Where data storage, applications or other services are provided by another business (e.g., a 'cloud provider') there must be independently audited, written confirmation that the provider uses data confidentiality, integrity and availability procedures which are the same as, or more comprehensive than those set out in this policy.

Protection from Malicious Software
The business shall use software countermeasures, including anti-malware, and management procedures to protect itself against the threat of malicious software.

All computers, servers, laptops, mobile phones and tablets shall have anti-malware software installed, where such anti-malware is available for the device's operating system.

All anti-malware software shall be set to:

- scan files and data on the device on a daily basis
- scan files on-access
- automatically check for, and install, virus definitions and updates to the software itself on a daily basis
- block access to malicious websites

Vulnerability scanning
The business shall have a yearly vulnerability scan of all external IP addresses carried out by a suitable external company or Delphini's own IT engineers.

The business shall act on the recommendations following the vulnerability scan in order to reduce the security risk presented by any significant vulnerabilities.
The results of the scan and any changes made shall be reflected in the company risk assessment and security policy as appropriate.

Response

Information security incidents
All breaches of this policy and all other information security incidents shall be reported to Remi Abbott or a Company Director.

If required as a result of an incident, data will be isolated to facilitate forensic examination. This decision shall be made by the Managing Director.

Information security incidents shall be recorded in the Security Incident Log and investigated by Remi Abbott to establish their cause and impact with a view to avoiding similar events. This policy shall be updated if required to reduce the risk of a similar incident re-occurring.

Business Continuity and Disaster Recovery Plans
The organisation shall ensure that business impact assessment, business continuity and disaster recovery plans are produced for all mission critical information, applications, systems and networks.

Reporting
Remi Abbott shall keep the business informed of the information security status of the organisation by means of regular reports to senior management.

Further Information
Further information and guidance on this policy can be obtained from Remi Abott – Remi@delphini.co.uk Comments and suggestions to improve security are always welcome.



Dave Cormack
Managing Director
November 2026

Right to Work in the UK Policy

Purpose
The purpose of this policy is to ensure that all personnel are aware of the eligibility requirements to work in the UK and in accordance to the Home Office Employer's Guide to right to work checks published on 1st October 2026 - Employer's guide to right to work checks . This policy contains documented controls that complies with Sections 15 to 25 of the Immigration, Asylum and Nationality Act 2006.

Scope
This process shall be applied by all current personnel and any new person to be employed or hired.

Process
Delphini shall check that a job applicant is allowed to work for you in the UK before you employ them.

Delphini shall see the applicant's original documents

Delphini shall check that the documents are valid with the applicant present.

Delphini will make and keep copies of the documents and record the date you made the check.
Delphini could face a civil penalty if you employ an illegal worker and haven't carried out a correct right to work check.
Delphini shall not discriminate against anyone because of their race.

Checking the documents

You need to check that:

- the documents are genuine, original and unchanged and belong to the person who has given them to you
- photos are the same across all documents and look like the applicant
- dates of birth are the same across all documents
- if 2 documents give different names, the applicant has supporting documents showing why they're different, such as a marriage certificate or divorce decree

If the applicant is not a British or Irish citizen, you'll also need to check that:

- the dates for the applicant's right to work in the UK have not expired
- the applicant has permission to do the type of work you're offering (including any limit on the number of hours they can work)
- for students you see evidence of their study and vacation times

Taking a copy of the documents

When you copy the documents:

make a copy that cannot be changed, for example a photocopy

make sure the copy is clear enough to read

for passports, copy any page with the expiry date and applicant's details (for example nationality, date of birth and photograph) including endorsements, for example a work visa

for all other documents you must make a complete copy

keep copies during the applicant's employment and for 2 years after they stop working for you

record the date the check was made

Make sure you follow Delphini's GDPR Info Security Policy.

If the job applicant cannot show their documents

You must ask the Home Office to check an employee's or potential employee's immigration status if they cannot show their documents or online immigration status.

This could be, for example, because they:

- have an outstanding appeal, review or application with the Home Office
- arrived in the UK before 1989 and do not have documents to prove their immigration status or right to work

You must also ask the Home Office to check their status if they have:

- a digital or non-digital Certificate of Application that says you need to ask the Home Office to check their right to work
- an Application Registration Card

Application Registration Cards must state that the work the employer is offering is permitted.

The Home Office will send you a 'Positive Verification Notice' to confirm that the applicant has the right to work. You must keep this document.



Dave Cormack
Managing Director
November 2026

Anti-Harassment and Bullying Policy

1. 1. Policy

We recognise that harassment and victimisation is unlawful under the Equality Act 2010 and are committed to creating a work environment free of harassment and bullying where every employee is treated with dignity and respect.

Harassment and bullying on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation is unacceptable and will not be tolerated.

Harassment takes many forms, ranging from tasteless jokes and abusive remarks to pestering for sexual favours, threatening behaviour and actual physical abuse. For the purposes of this policy, it also includes bullying.

Bullying is understood to be targeted and persistent offensive, intimidating, malicious or insulting behaviour and can include the abuse or misuse of power to undermine, humiliate, denigrate or injure the recipient.

We will not tolerate harassment or bullying of any kind. Allegations of harassment and bullying will be investigated and where appropriate, disciplinary action will be taken. We will not tolerate victimisation of a person for making allegations of harassment or bullying in good faith or supporting someone to make such a complaint.

2. Scope of this Policy

This policy covers harassment and bullying of employees, contractors, agency staff and anyone else engaged to work for us, whether by direct contract with us or otherwise and covers harassment and bullying at work and in any work-related setting outside the workplace.

3. Harassment and Bullying

Harassment and bullying are offensive, intimidating, malicious or insulting behaviour including the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. It can include the use of both personal strength and/or the use of fear or intimidation to coerce individuals. It can be verbal
and/or non-verbal and does not need to emanate from someone more senior that the victim. However,
legitimate, reasonable and constructive criticism of an employee's performance or behaviour, or reasonable instructions given to them in the course of their employment, will not amount to harassment or bullying on their own.

3.1 Examples of Personal Harassment

Harassment takes many forms and employees may not always realise that their behaviour constitutes harassment. Harassment is unwanted behaviour by one employee towards another and examples of harassment include:

- insensitive jokes and pranks;
- lewd or abusive comments;
- deliberate exclusion from conversations and social activities;
- displaying abusive or offensive writing or material;
- abusive, threatening or insulting words or behaviour;
- name-calling;
- picking on someone or setting them up to fail;
- exclusion or victimisation;
- undermining their contribution/position;
- demanding a greater work output than is reasonably feasible;
- blocking promotion or other development/advancement.

These examples are not exhaustive and disciplinary action at the appropriate level will be taken against employees who engages in any form of personal harassment.

3.2 Examples of Sexual Harassment

Sexual harassment can take place in many forms within the workplace and can go undetected for a period of time where employees do not understand that particular behaviour is classed as sexual harassment. Sexual harassment is unwanted behaviour related to sex, or of a sexual nature, by one employee towards another and examples of sexual harassment include:

- lewd or abusive comments of a sexual nature, such as regarding an individual's appearance or body;
- unwelcome touching of a sexual nature;
- displaying sexually suggestive or sexually offensive writing or material;
- asking questions of a sexual nature;
- sexual propositions or advances, whether made in writing or verbally.

Sexual harassment can also take place where an employee is treated less favourably because they have rejected, or submitted to, the unwanted conduct that is related to sex or is of a sexual nature and may include blocking promotion and refusal of training opportunities or other development opportunities.

3.3 Examples of Victimisation

Victimisation takes place when an employee is treated unfavourably as a direct result of raising a genuine complaint of discrimination or harassment. Furthermore, any employee who supports or assists another employee to raise a complaint will also be subjected to victimisation if they are treated unfavourably.

3.4 Third Party Harassment

We operate a zero-tolerance policy in relation to harassment perpetrated against one of our employees by a third party, such as a client/customer or visitor. All employees are encouraged to report any and all instances of harassment that involve a third party in line with our reporting procedure, as outlined below.

If we find that an allegation is well-founded, we will take the steps we deem necessary in order to remedy this complaint. This can include, but is not limited to:

- warning the individual about the inappropriate nature of their behaviour;
- banning the individual from our premises;
- reporting the individual's actions to the police.

In addition to this, we will endeavour to take reasonable steps to deter and prevent any form of harassment from third parties taking place.

4. Responsibilities

4.1 Employee responsibilities

We require employees to behave appropriately and professionally at all times during the working day and this may extend to events outside of working hours which are classed as work-related, such as social events. Employees should not engage in discriminatory, harassing or aggressive behaviour towards any other person at any time.
Any form of harassment, bullying or victimisation may lead to disciplinary action up to and including dismissal if it is committed:

- in a work situation;
- during any situation related to work, such as a social event;

- against a colleague or other person connected to the employer outside of a work situation, including on social media;
- against anyone outside of a work situation where the incident is relevant to their suitability to carry out the role.

A breach of this policy will be treated as a disciplinary manner.

4.2 Employer responsibilities

We are responsible for ensuring all employees, including those in management positions, understand the
rules and policies relating to the prevention of harassing and bullying behaviour at work and during work-related social events. We will promote a professional and positive workplace whereby managers are alert and proactively identify areas of risk
and incidents of harassment, sexual harassment and bullying.

We will also take into account aggravating factors, such as abuse of power over a more junior colleague when deciding what disciplinary action to take. Where an incident is witnessed, or a complaint is made under this policy, we will take prompt action to deal with this matter. All incidents will be deemed serious and dealt within
in a sensitive and confidential manner.

5. Complaints About Harassment, Bullying or Victimisation

We have established this procedure to inform employees of the type of behaviour that is unacceptable and to provide employees who are the victims of harassment, bullying or victimisation with the means of redress.

5.1 Informal Complaints
For sexual harassment, informal resolution is entirely optional. Individuals may report concerns directly through the formal channels below at any time and are not required to approach the alleged harasser.

We recognise that complaints of personal harassment, bullying or victimisation can sometimes be of a sensitive or intimate nature and that it may not be appropriate for you to raise the issue through the grievance procedure.

Where possible, employees should try to sort out matters informally. An individual may not know that his / her behaviour is unwelcome or upsetting. An informal discussion may help him / her to understand the effects of his / her behaviour and agree to change it. An employee may feel able to approach the person him / herself, or with the help of someone for support such as another employee or employee representative. Alternatively, an initial approach may be made on an employee's behalf by one of these people. The employee

concerned should be told what behaviour is considered to be offensive and unwelcome and that it should be stopped immediately. An employee may also state that if the behaviour continues, he / she intends to make a formal complaint.

If you are the victim of minor harassment, you should make it clear to the harasser on an informal basis that their behaviour is unwelcome and ask the individual to stop. If you feel unable to do this verbally then you should give a written request to the harasser.

5.2 Formal Complaints

Where an informal approach fails or if the harassment, bullying or victimisation is more serious, you should bring the matter to the attention of your manager as a formal written grievance. If possible, you should keep notes of any incidents that constitute, harassment, bullying or victimisation so that the written complaint can include:

- the name of the alleged harasser;
- the nature of the alleged harassment;
- the dates and times when the alleged harassment occurred;
- the names of any witnesses;
- any action already taken by you to stop the alleged harassment.

Where you cannot make the formal complaint to your manager e.g. where he / she is the alleged harasser, we would encourage you to raise your complaint to the Managing Director.

On receipt of a formal complaint, we will take action to separate you from the individual where practically possible to enable an investigation as may be appropriate to be conducted. This may involve a temporary transfer of the alleged harasser to another work area or suspension with contractual pay until the matter has been resolved.

On conclusion of any investigation, a report of the findings will be submitted to the manager who will hold the grievance meeting.

You will be invited to attend a meeting. You have the right to be accompanied at such a meeting by a work colleague or employee representative. Those involved in the investigation will be expected to act in confidence and any breach of confidence will be a disciplinary matter.

You will be able to put your case forward at the meeting and the manager will explain the outcome of the investigation. You also have a right to appeal within 5 working days against the outcome of a grievance meeting.

If the decision is that the allegation is well-founded, the individual will be liable to disciplinary action in accordance with our disciplinary procedures up to and including dismissal.

We are committed to ensuring employees are not discouraged from using this procedure and no employee will be victimised for having brought a complaint.

6. Specific Prevention of Sexual Harassment

Delphini Limited has zero tolerance for sexual harassment, including harassment which is sexual in nature, whether committed by employees, managers, agency workers, subcontractors, customers, clients, visitors, suppliers or members of the public. This applies at company premises, construction and port sites, client locations, work-related travel, training, social events and work-related digital communications.

Sexual harassment includes unwanted conduct of a sexual nature which has the purpose or effect of violating dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment. Examples include sexual jokes, comments or gestures; repeated unwanted invitations; sexual messages, images or online content; intrusive questions; unwanted physical contact; and pressure for sexual favours. A single incident may constitute sexual harassment. Conduct does not have to be intended to offend to be unacceptable.

Managers must actively prevent sexual harassment and must not wait for a formal complaint before responding to witnessed or reported concerns. Where third parties present a risk, reasonable protective measures may include informing the client or principal contractor, requesting removal or replacement of an individual, changing access arrangements, providing supervision and escalating serious incidents to the police where appropriate.

7. Reporting and Resolution Arrangements

Anyone experiencing or witnessing sexual harassment should report it promptly to their line manager, site manager or the Managing Director. Reports may be made verbally or in writing, including by email or through the company grievance procedure. Where the manager is implicated, or the reporter is uncomfortable approaching them, the report should go directly to the Managing Director. Agency and subcontract personnel may use these channels as well as their own employer or agency contact.

There is no requirement to confront the alleged harasser, attempt informal resolution or submit a written grievance before a concern is considered. Reports will be acknowledged promptly, immediate safety and welfare needs assessed, and an impartial person appointed to investigate as appropriate. The investigator will speak with relevant parties, review available evidence, record findings and recommend proportionate action. The person raising the concern will be informed of the outcome as far as confidentiality permits, and the existing right of appeal within five working days will apply to grievance outcomes.

Information will be shared only with those who need it to respond fairly and effectively; absolute confidentiality cannot be guaranteed. Retaliation, intimidation or victimisation for raising a concern or participating in an investigation is prohibited. Appropriate support and

interim protection will be considered without automatically disadvantaging the complainant. Potential criminal conduct may be referred to the police.

8. Communication, Induction and Training

This policy will be communicated to employees, managers, agency workers and relevant subcontractors during induction and made accessible the company HR portal SMB and site briefings. Staff will be reminded of the zero-tolerance standard, examples of prohibited conduct, third-party risks and reporting routes. Managers and supervisors will receive appropriate instruction on recognising warning signs, handling disclosures sensitively, escalating concerns, preserving evidence and preventing retaliation. Attendance, briefing acknowledgements and training completion will be recorded.

9. Risk Assessment, Monitoring and Review

The company will assess foreseeable sexual harassment risks, considering lone working, isolated site areas, welfare facilities, work travel, client and public interaction, night shifts, unequal power relationships, work social events and electronic communications. Control measures and responsible persons will be documented in relevant workplace or project risk assessments and reviewed when working arrangements or concerns change. Management will monitor anonymised complaint trends, incident reports, workforce feedback, training records, risk assessments and the effectiveness of corrective actions. Findings and lessons learned will be used to improve controls and communication without identifying complainants unnecessarily. This policy and associated prevention arrangements will be reviewed at least annually and sooner after a significant incident, legal change or identified control failure.



David Cormack
Managing Director
November 2026

DELPHINI LTD
LIFTING, SECURING & SAFETY EQUIPMENT

Anti-Facilitation of Tax Evasion Policy

We take a zero-tolerance approach to the facilitation of tax evasion, whether under UK law or under the law of any foreign country. We are committed to upholding all laws relevant to countering tax evasion (including the Criminal Finances Act 2017 (the Act)) in any jurisdiction in which we operate.

It is our policy to conduct all of our business in a professional, fair, honest and ethical manner. We will not tolerate anyone associated with us (as defined in the Act) who deliberately and dishonestly facilitates the criminal evasion of tax by a third party. Any employee who is suspected to have facilitated tax evasion will be subject to our disciplinary procedures and reported to the relevant authority.

It is our expectation that all those to which/whom we provide services, or which/who provide services to us will act with integrity and pay the appropriate amount of tax. We will not act for any entity or individual where we know or suspect that they are attempting to exploit or misuse our services for the purpose of tax evasion. Should we discover that any agent associated with us has attempted to, or succeeded in, facilitating tax evasion by a third party, we will cease to engage with them immediately, and report them to the relevant authority.

All Delphini financial payments are entered on HMRC recognised Sage software and our accounts are independently annually audited by professional auditors conducted in our offices in accordance with International Standards on Auditing (UK) (ISAs (UK)) and applicable law.

The directors carry out monthly due diligence by carrying out reconciliation checks and management accounts review meetings. The directors acknowledge their responsibilities for preparing the Annual Report and the financial statements in accordance with applicable law and regulations. Company law requires the directors to prepare financial statements for each financial year. Under that law the directors have elected to prepare the financial statements in accordance with United Kingdom Generally Accepted Accounting Practice (United Kingdom Accounting Standards and applicable law).

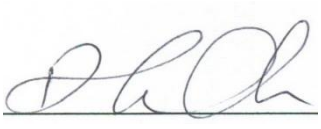
Under company law the directors must not approve the financial statements unless they are satisfied that they give a true and fair view of the state of affairs of the company and of the profit or loss of the company for that period. In preparing these financial statements, the directors are required to:

select suitable accounting policies and apply them consistently;

make judgements and accounting estimates that are reasonable and prudent; and

prepare the financial statements on the going concern basis unless it is inappropriate to presume that the company will continue in business.

The directors are responsible for keeping adequate accounting records that are sufficient to show and explain the company's transactions and disclose with reasonable accuracy at any time the financial position of the company and enable them to ensure that the financial statements comply with the Companies Act 2006. They are also responsible for safeguarding the assets of the company and hence for taking reasonable steps for the prevention and detection of fraud and other irregularities.



David Cormack
Managing Director – November 2026