

SILVMARC LTD

Whistleblowing Policy

Policy document

Document reference	SILV-POL-03
Version	1.0
Status	Approved
Effective date	June 2026
Next review	By 31 May 2027
Policy owner	Director
Approved by	Bogdan Barna, Director

1. Purpose and scope

SILVMARC LTD is committed to conducting its business honestly, lawfully, and with integrity. This policy encourages anyone working for or with SILVMARC, and the workers we place, to raise genuine concerns about wrongdoing without fear of reprisal. It supports our wider commitment to preventing modern slavery, exploitation, and other malpractice.

This policy applies to the director, employees, workers placed by SILVMARC, subcontractors, suppliers, and any other party connected with our business.

2. What this policy covers

You should raise a concern under this policy if you become aware of, or genuinely suspect, any of the following:

- modern slavery, human trafficking, forced labour, or any form of worker exploitation;
- a worker being underpaid, having wages withheld, or being required to pay unlawful fees;
- unsafe working conditions or a danger to health and safety;
- fraud, bribery, or other financial wrongdoing;
- a breach of any of SILVMARC's policies or of the law; or
- the deliberate concealment of any of the above.

This policy is for raising concerns in the public interest. It is not a route for personal complaints about your own engagement, which should be raised through the appropriate grievance route.

3. How to raise a concern

Concerns should be raised as soon as possible. You can raise a concern:

- directly with the director of SILVMARC, by email to contact@silvmarc.co.uk or by telephone on +44 20 3917 4761; or
- in writing, marked confidential, to SILVMARC LTD at its registered office, 86–90 Paul Street, London, EC2A 4NE.

Please give as much detail as you can, including what happened, when, who was involved, and any supporting information. You do not need to prove your concern — you only need a genuine and reasonable belief.

4. Confidentiality and anonymity

We will treat your concern confidentially and will only disclose your identity where it is necessary to investigate properly or where we are required to do so by law; wherever possible we will discuss this with you first. You may raise a concern anonymously, but anonymous concerns can be more difficult to investigate, so we encourage you to identify yourself where you feel able to.

5. Protection from detriment

No one who raises a genuine concern in good faith will suffer any detriment, dismissal, or unfavourable treatment as a result, even if the concern turns out to be mistaken. Workers who make a qualifying disclosure are protected under the Public Interest Disclosure Act 1998. Victimising or retaliating against someone who has raised a concern is itself a disciplinary matter and may lead to termination of engagement.

6. How concerns are handled

All concerns will be taken seriously and looked into promptly. We will acknowledge your concern, assess what action is needed, investigate proportionately, and — so far as we are able — keep you informed of the outcome. Where wrongdoing is found, we will take appropriate action, which may include disciplinary action, terminating a contract, and reporting the matter to the relevant authorities.

7. Raising a concern externally

If you feel unable to raise a concern internally, or you are not satisfied with how it has been handled, you can contact:

- the Modern Slavery & Exploitation Helpline on 08000 121 700;
- the Gangmasters and Labour Abuse Authority (GLAA);
- the independent whistleblowing charity Protect (advice line: 020 3117 2520); or
- the police on 101, or 999 in an emergency.

The UK Government publishes a list of “prescribed persons” to whom certain whistleblowing disclosures can be made.

8. Monitoring and review

This policy is owned by the director and reviewed at least annually.

Approval

This policy has been approved and adopted by the director of SILVMARC LTD and is reviewed at least annually.

Signed:	<u>Bogdan Barna</u>
Name:	Bogdan Barna
Position:	Director, SILVMARC LTD
Date:	<u>2026-06-27</u>

Audit trail

Details

FILE NAME	SILVMARC-Whistleblowing-Policy.docx - 27/06/2026, 09:04
STATUS	Signed
STATUS TIMESTAMP	2026/06/27 08:06:57 UTC

Activity

SENT	bogdanbarna@silvmarc.co.uk sent a signature request to: Bogdan Barna (bogdanbarna@silvmarc.co.uk)	2026/06/27 08:04:37 UTC
SIGNED	Signed by Bogdan Barna (bogdanbarna@silvmarc.co.uk)	2026/06/27 08:06:57 UTC
COMPLETED	This document has been signed by all signers and is complete	2026/06/27 08:06:57 UTC

The email address indicated above for each signer may be associated with a Google account, and may either be the primary email address or secondary email address associated with that account.