

Danny Sullivan Group is committed to tackling Modern Slavery and Human Trafficking and protecting the principles of human rights.

We are;

- Accredited against the Ethical Labour Sourcing Standard,
- BES 6002 Signatories of the Gangmasters & Labour Abuse Authority (GLAA)
- Construction Protocol Gold level partners with the Supply Chain Sustainability School (SCSS)

We respect the international principles of human rights including, but not limited to, those expressed in the UN Declaration of Human Rights, United Nations Global Compact Principles, Children's Rights and Business Principles, Women's Empowerment Principles and those principles contained within the UK's Modern Slavery Act 2015.

We are committed to legal compliance, ethical standards and fundamental human rights as set out by the principles of the ILO/UN Guiding Principles Danny Sullivan Group is also committed to protecting and promoting human rights and will not tolerate;

- Child labour
- Forced labour
  - Including prison labour or any use of force or other forms of coercion
- Fraud
- Deception
- Abuse of power or other means to achieve control over another person for the purpose of exploitation.

**"Addressing modern slavery requires a united effort. We work closely with our partners, clients, and employees to create a transparent and ethical industry. Together, we can make a significant impact in the fight against modern slavery from within the heart of our people-centric business."**

Our approach to monitoring and minimising the risk of Modern Slavery is embodied in our company values; Act Ethically and Responsibly, Culture of Care and Support, Strive for Excellence and Collaborate and Communicate.

We acknowledge that as an industry we do not yet understand the full extent of Modern Slavery and it is essential that we work closely with our suppliers, employees and clients to tackle the issue.

If any of our employees have concerns about an issue relating to Modern Slavery, we instruct them to report this information to our HR department which is an anonymous and confidential service; [HR@dannysullivan.co.uk](mailto:HR@dannysullivan.co.uk)

There are many resources and helplines that are accessible to our employees to learn more about modern slavery or if they wish to report information they may have. We recommend:

- Unseen App
- Modern Slavery Helpline - 08000 121 700
- <https://www.supplychainschool.co.uk/default/modern-slavery.aspx>

Actions we have taken to further support this area:

- Our commitment to the UK Modern Slavery Act 2015 is printed in our DSG employee handbook
- We have provided Modern Slavery Awareness training to staff in collaboration with the Supply Chain Sustainability School
- We have conducted numerous workshops in collaboration with the Supply Chain Sustainability School, sharing knowledge to clients and fellow members of the supply chain on the processes and procedures implemented across our business to help minimise the risk of modern slavery within the workforce
- Achieved the CITB Be Fair Framework accreditation, becoming the first labour supply in the UK to have received this
- Used the FIR Steering Group to monitor and review new information regarding labour exploitation as well as set KPI's across the business, ensuring our commitment to minimising the risk of human trafficking and modern slavery



The Modern Slavery Act 2015 requires Danny Sullivan Group (DSG) to disclose annually online, as a minimum, the following:

- The organisation's structure of the business
- Its' policies in relation to slavery and human trafficking
- Its' due diligence processes in relation to slavery and human trafficking in its business
- The parts of its business where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk
- Its effectiveness in ensuring that slavery and human trafficking is not taking place in its business, measured against such performance indicators as it considers appropriate
- The training available to its staff throughout the organisation

### **Organisation Structure and Supply Chains**

Danny Sullivan Group (DSG) operates across various sectors, including construction, infrastructure, and engineering. DSG employs approximately 3,000 staff members and engages with a minimal supply chain to purchase goods, services, and works.

### **Policies in Relation to Slavery and Human Trafficking**

DSG has a zero tolerance policy towards modern slavery and human trafficking and is committed to protecting human rights. We act ethically and with integrity in all our business dealings and relationships, implementing and enforcing effective systems and controls to ensure DSG is not contributing to modern slavery in any way.

We have appropriate processes and policies in place to mitigate the risk of modern slavery and human trafficking in our organisation and supply chains:

- Employee Handbook guidelines
- Equality and Diversity Policy
- Ethical Code of Conduct

Our commitment to workplace rights for employees is outlined in our staff policies.

DSG encourages employees to report any concerns about serious wrongdoing in a responsible and appropriate manner.



## Due Diligence Processes

DSG takes the following measures to identify, assess, and mitigate potential risk areas in its supply chain. We conduct procurement activities in an environmentally, socially, ethically, and economically responsible manner and enter into agreements with suppliers that share and adhere to our vision. Our terms require our suppliers to state that they do not use forced, involuntary, or underage labour, treat employees fairly, and provide suitable working terms and conditions.

## Risk, Steps and Measurements

As a labour supplier for the construction industry, Danny Sullivan Group (DSG) recognises that certain areas of our operations may be more susceptible to the risks of modern slavery and human trafficking. This includes:

- Recruitment Practices: The recruitment of workers, especially from vulnerable populations, can be a risk area if not managed with stringent controls.

To assess and manage these risks, DSG has implemented the following steps:

1. Due Diligence Processes: We conduct regular audits and assessments of our minimal supply chain to ensure compliance with our ethical standards. This includes evaluating the labour practices of our subcontractors and suppliers.
2. Training and Awareness: We provide comprehensive training to our staff on modern slavery awareness, including how to identify and report potential cases of exploitation.
3. Reporting Mechanisms: We have established confidential and anonymous reporting channels for employees to report any concerns related to modern slavery.

To ensure the effectiveness of our efforts in preventing modern slavery and human trafficking, DSG measures its performance against the following indicators:

1. Training Completion Rates: Monitoring the completion rates of modern slavery awareness training among our staff to ensure that all employees are educated on the risks and signs of modern slavery.



2. Incident Reporting: Monitoring the number of reported incidents related to modern slavery and the actions taken in response. This helps us identify areas for improvement and ensure that our reporting mechanisms are effective.
3. Stakeholder Feedback: Gathering feedback from employees, suppliers, and clients on our modern slavery policies and practices to identify areas for enhancement.

By continuously monitoring these indicators, DSG aims to ensure that slavery and human trafficking are not taking place within our business or supply chains. We are committed to ongoing improvement and transparency in our efforts to combat modern slavery.

### **Training**

We provide comprehensive training to all staff on modern slavery awareness, including workshops, e-learning modules, and collaboration with the Supply Chain Sustainability School. Training sessions are conducted annually and updated regularly to reflect new insights and best practices.

An update of targets set will be reported in next year's Modern Slavery and Anti Human Trafficking Policy Statement. Danny Sullivan Group will update and publish this Modern Slavery and Anti Human Trafficking Policy Statement annually

Timothy O'Sullivan

Managing Director

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