
Employee Conflict of Interest Policy

February 2026

EMPLOYEE CONFLICT OF INTEREST POLICY

Policy brief & purpose

This Conflict of Interest Policy:

- Applies to all employees of Danny Sullivan Group Limited and its subsidiaries (Danny Sullivan & Sons Ltd, Diamond Construction & Engineering Recruitment Limited, and Danny Sullivan Group Academy Limited); and
- Refers to any case where an employee's personal interest might contradict the interest of the company they work for. This is an unwanted circumstance as it may have heavy implications on the employee's judgement and commitment to the company, and by extension to the realisation of its goals.

This policy outlines the rules regarding conflict of interest and the responsibilities of employees and the company in resolving any such discrepancies.

Scope

This Conflict of Interest policy applies to all prospective or current employees of DSG, as well as independent contractors and persons acting on behalf of DSG.

Policy elements

The relationship of DSG with its employees should be based on mutual trust. As DSG is committed to preserve the interests of people under its employment, it expects them to act only towards its own fundamental interests.

Conflict of interest may occur whenever an employee's interest in a particular subject may lead them to actions, activities or relationships that undermine DSG and may place DSG at a disadvantage (including but not limited to damage to DSG's reputation)

What is an employee conflict of interest?

This situation may take many different forms that include, but are not limited to, conflict of interest examples:

- Employees' ability to use their position with DSG to their personal advantage
- Employees engaging in activities that will bring direct or indirect profit to a competitor
- Employees owning shares of a competitor's stock
- Employees using connections obtained through DSG for their own private purposes
- Employees using DSG equipment or means to support an external business

- Employees acting in ways that may compromise DSG's legality (for example committing fraud or taking or offering bribes)

The possibility that a conflict of interest may occur can be addressed and resolved before any actual damage is done. Therefore, when an employee understands or suspects that a conflict of interest exists, they should bring this matter to the attention of their line manager so corrective actions may be taken. Line managers must also keep an eye on potential conflict of interests of those reporting to them.

The responsibility of resolving a conflict of interest starts with the line manager and may reach the Senior Leadership Team. All conflicts of interest will be resolved as fairly as possible. Senior management has the responsibility of making the final decision when a solution cannot be found.

Inline with our Whistleblowing Policy, all employees and others associated with DSG should raise any concerns they have either with their line manager, DSG's General Counsel or via DSG's whistleblowing service currently provided by AAB. You can raise a concern through:

1. The online form: fileaconcern.org/dannysullivan
2. Phone: 0800 026 0466 (Toll-free from most landlines)

In general, employees are advised to refrain from letting personal and/or financial interests and external activities come into opposition with DSG's fundamental interests.

Disciplinary Consequences

In cases when a conflict of interest is deliberately concealed or when a solution cannot be found, disciplinary action may be invoked up to and including dismissal.



Russell Deards
General Counsel & Company Secretary
1st February 2026