

Danny Sullivan Group

Anti Bribery & Corruption



DANNY SULLIVAN
GROUP

Russell Deards General Counsel & Company Secretary

- DSG takes a zero-tolerance approach to bribery and corruption
- We are committed to transparency, for both our staff and clients
- We promote a fair, consistent, and compliant process



**DANNY SULLIVAN
GROUP**



Anti-Bribery & Corruption

Promoting a fair, consistent and compliant process



Introduction

“At DSG, we are committed to always working honestly and professionally.

We have zero tolerance for bribery, corruption, or fraud.

This applies to everyone: employees, agency workers, subcontractors, and suppliers.

Breaking the rules isn't just against company policy, it's against the law.”



What Is a Bribe?

A bribe is offering or accepting anything of value to make someone act improperly.

It could be:

- Cash
- Gifts
- Expensive hospitality
- A job for a family member
- Extra work or favours

It becomes an offence the moment it's offered, even if it's refused.

We have a separate Gifts & Hospitality Policy with further learning and support for those it is most relevant to, but the policy and more information is on DSG's website.



Real Site Examples

- If a supplier offers you tickets or gifts expecting you to influence a contract, that's bribery.
- Someone asking for small extra payment to “speed things up.” - that's also bribery.”
- Someone asking you to give them a weekly payment to ensure you stay on the site – that's bribery too.



Fraud

Fraud can also happen on site.

For example:

Adding extra hours to a timesheet when those hours were not actually worked...
or recording employees as working when they were not on site...

To increase the value of an invoice.

That is fraud.

Even if someone says, 'everyone does it', it is illegal and could lead to dismissal, fines, or imprisonment.

All these examples also expose DSG to the risk of being prosecuted failing to prevent bribery or fraud.



Red Flags

Watch out for red flags:

- Cash payments
- Unusual gifts
- Pressure to bypass procedures
- ‘Keep this quiet’ conversations
- No invoices or paperwork

If something feels wrong, stop and ask yourself about it and always report your concerns.



Your Responsibility

If you're offered a bribe, asked to make one, or see something suspicious:

- Speak to your Line Manager, or
- Contact the Company Secretary on compliance@dannysullivan.co.uk or
- Use the Whistleblowing procedures. These procedures are located on the **Policies and Related Documents** section of DSG's website.

We also have a toolbox talk on whistleblowing and speaking up.

You will be supported for raising genuine concerns.

If something feels wrong, stop and ask yourself about it and always report your concerns.



The Simple Test

“Just a Few Extra Hours’ Leads to Criminal Conviction for Site Operative”

Sub-line:

‘Judge says small frauds are still serious offences.’

Imagine seeing that in a newspaper, referring to you.

Ask yourself: Would I be comfortable seeing this in the news?

If the answer is no, don’t do it.

Integrity is how we work.

Always act in accordance with DSG’s values



Our Values

| Be Fair | Be Committed | Be Well | Be Courageous |
|---|--|--|--|
| Inclusive Ensure an equal, diverse and inclusive workplace | Team Players Working as an intrinsic team across all levels | Creative Find innovative solutions to work more efficiently | Deliver Deliver the best quality staff to our customers |
| Supportive Support vulnerable groups | Client First Work with our clients to achieve all goals | Safe Environment Get everyone home safely everyday | Train Highest level of education, training and opportunities for our staff |
| Conscious Minimise our impact on the environment | Considerate Work with our competitors to deliver a common goal | Have Integrity Influence the culture of the workplace to always do the right thing | Rise Above Exceed expectation |
| Fair Provide fair pay, rigorous data and financial management | Creative Find innovative solutions to work more efficiently | Supporting Wellbeing We focus on our staff's wellbeing - physically and mentally | Excellence Always go the extra mile |



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Together We Make The Difference

- OUR VALUES
 - Team Players
 - Fair
 - Have Integrity
- If you see something, say something
- Lets talk...
- Thank you for playing your part

