

Danny Sullivan Group (**DSG**) is committed to tackling Modern Slavery and Human Trafficking and protecting the principles of human rights. We recognise the moral obligation to protect human rights, uphold dignity, and exercise social responsibility, pledging to foster transparency and accountability throughout our endeavours.

We are;

- Accredited against the Ethical Labour Sourcing Standard,
- 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. DSG 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 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 and associated Behaviours :

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

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 and that construction is a high-risk industry as assessed by the statutory TISC Guidance when considering:

- Industry type
- Nature of workforce
- Supplier location
- Operating context
- Commodity risk
- Business model

If any of our employees have concerns about an issue relating to Modern Slavery, we ask them to report concerns to their line manager, the General Counsel & Company Secretary, or if they prefer our independent whistleblowing service provider.

The Danny Sullivan Sullivan Group Whistleblowing Service is provided by AAB

You can access this service via the following reporting channels:

- By completing an online web report via the AAB website - <https://fileaconcern.org/dannysullivan>
- By ringing your International Toll-free number (ITFN) - 0800 026 0466

For more information on our services please click on the link above to view the AAB introduction video

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 in the last 12 months to further improve employee awareness include:

- We have provided Modern Slavery Awareness training to staff in collaboration with the Supply Chain Sustainability School
- We have now launched a short toolbox talk on the subject which is delivered to all of workers both operatives and support staff
- Continued to use 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**

DSG operates across various sectors, including construction, infrastructure, and engineering. DSG employs approximately 1,100 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:

- Modern Slavery Policy
- Dignity at work policy
- FIR and EDI Policy
- Whistleblowing Policy

Our commitment to workplace rights for workers is outlined in our policies; which are available on our website.

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 that approach. 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, DSG recognises that our recruitment processes and those of our supply chain partners may be susceptible to the risks of modern slavery and human trafficking. Especially with recruitment from vulnerable populations, 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. There have been none in the last 12 months.
3. **Stakeholder Feedback:** Gathering feedback from employees, suppliers, and clients on our modern slavery policies and practices to identify areas for enhancement (which led to the development of a focused toolbox talk highlighting the risks of modern slavery, the signs to look for and how reporting those concerns is in line with DSG's Values and associated Behaviours).

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 Training sessions are conducted annually and updated regularly to reflect new insights and best practices.

DSG will continue update and publish this Modern Slavery and Anti Human Trafficking Policy Statement annually



Russell Deards  
General Counsel & Company Secretary

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