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# Modern Slavery and Human Trafficking Statement



# MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT FY23-24

At Driver Group we will not tolerate, allow, or turn a blind eye to any form of modern slavery or human trafficking. We are committed to acting ethically at all times and in all business dealing by promoting our core values:



## STRUCTURE, BUSINESS AND SUPPLY CHAINS

A global multi-disciplinary consultancy, we have been providing specialist services to the engineering and construction industry since 1978.

We provide specialist dispute avoidance and dispute resolution services to our clients from the outset of a project to its completion, and beyond.

We offer strategic commercial improvement and contract management services; live planning and programme assistance and forensic delay analysis; dispute avoidance and dispute resolution support and expertise; and training seminars tailored to our clients' needs.

We have an experienced and highly qualified team who are dedicated to delivering exceptional services on time and within budget. We utilise their combined skills and expertise to create innovative and flexible solutions for our clients, at every opportunity.



## Markets

Driver Group is strongly positioned in the Global market with 28 offices across 16 countries, spreading over 5 continents including the United Kingdom, Europe, Canada, United States, Middle East and Asia-Pacific.

## SECTORS

### **BUILDING:**

For those involved in the demolition, construction, or refurbishment of buildings, the importance of proper planning, costing and controlling of the works can never be underestimated.

Driver Trett's extensive experience covers a range of new build, refurbishment and fit out projects in both the public and private sector

### **ENERGY:**

Driver Trett's inherently multi-disciplinary business makes us the first choice to deliver dynamic commercial solutions and support project delivery across the energy sector.

With specialists in civil and structural engineering, mechanical, electrical and instrumentation, insulation, HVAC and coatings, we offer an unrivalled level of expertise in this field.



### **MINING:**

The mining of natural resources, including coal, metals and minerals, is one of the world's largest and most important industries. Driver Trett's team is highly skilled in identifying, addressing and managing the issues which commonly arise across the sector, offering commercially driven solutions and strategies.



### **PROCESS AND INDUSTRIAL:**

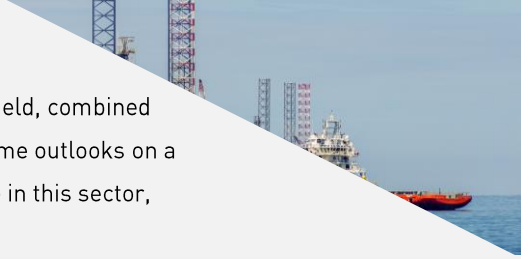
In recent times, the process and industrial sector has faced immense pressure on capital and operating expenditure budgets, as a result of worldwide competition and the drive to reduce emissions. Driver Trett has a solid working knowledge of the sector, whether advising in a commercial and project support capacity, or delivering technical expertise in a live project environment.



## SECTORS

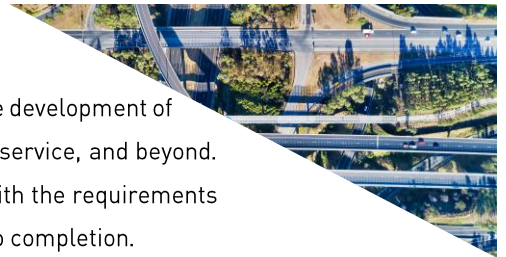
### SHIPBUILDING AND MARINE:

The unique and extreme challenges that our clients face on marine and shipbuilding projects require an exceptional depth of knowledge in the field, combined with a sharp commercial eye for the contractual, financial and programme outlooks on a project. Many members of our team have extensive practical experience in this sector, offering an unrivalled skill set to our clients



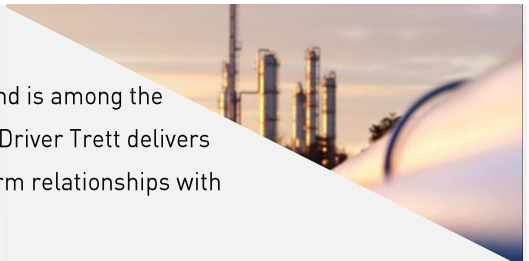
### TRANSPORT AND INFRASTRUCTURE:

These highly complex and essential projects form the backbone of the future development of any region. They deliver solutions on a grand scale to the populations they service, and beyond. Driver Trett has over 30 years' experience in understanding and working with the requirements of the teams responsible for implementing these schemes, from inception to completion.



### OIL AND GAS:

The oil and gas sector represents one of the world's biggest markets and is among the most technically challenging of all areas in which to work and operate. Driver Trett delivers services to both client organisations and contractors, including long-term relationships with leading national and international oil and gas operating companies.





- **Dispute Avoidance and Dispute Resolution:** Helping our clients avoid disputes is key to the services we deliver. Our strategic commercial management and front-end programming and project monitoring services are particularly focused on providing our clients with the knowledge and tools to avoid formal dispute resolution proceedings. Our extensive practical experience enables us to identify potential risks before they develop into more complex disputes, allowing our clients to consider proactive measures to monitor and manage those issues. Even on the most well-managed projects however, disputes can still arise between the parties. Driver Trett offers focused, practical support and assistance in relation to cost, time or project management issues. We work closely with our clients, including contractors, subcontractors, consultants, developers and legal firms, to deliver robust and effective solutions.
- **Strategic Commercial Improvement and Contract Management:** Having a clear contractual and commercial strategy for managing the contract, the works and the associated risks is essential to the successful delivery of a project. Driver Trett is expert in this field and considers that identifying, influencing and managing the delivery of the appropriate contractual obligations and processes is part of our core skill set. Our consultancy team has a sharp commercial focus, ensuring that we deliver results that add value beyond our clients' expectations.
- **Planning and Programming:** We recognise the central role played by effective and robust planning and programming in the smooth delivery of any construction engineering project. Our team provides support from inception to completion and beyond, including feasibility and baseline audits, project monitoring and progress reporting, ongoing risk identification and forensic delay analysis.

## SERVICES

- **Training Seminars and Workshops:** Driver Trett has a vast internal knowledge base resulting from the extensive experience that each of our members of staff has amassed, the varied sectors in which we have worked and the solutions and strategies we have developed and delivered to our clients. We are an Official Chartered ICES training provider and are able to add value to our clients' businesses by providing a wide range of tailored training programmes for staff of all levels of experience and knowledge.
- **[Diales:](#)** The Driver Trett team has extensive expert knowledge, and for higher profile litigation and arbitration, we have our Diales team. Diales Experts offer uncompromised expertise to the legal profession in Arbitration, Litigation, and Alternative Dispute Resolution. Working across all areas of the construction and engineering industry, our Experts offer focused support within Delay analysis, Quantum and Damages, and Technical: Architectural, Mechanical, Electrical, Project Management etc.
- **[Driver Project Services:](#)** The DPS branch of Driver Group delivers project management, commercial management, quantity surveying, risk, and planning services throughout the full project lifecycle. From design, planning, construction and commissioning to beneficial operation, maintenance and decommissioning of schemes.



## SUPPLY CHAIN

Driver Group has a zero-tolerance approach to modern slavery and communicates this to all levels of the supply chain from contractors, sub-consultants and business partners when entering into new or renewed contracts. Driver Group acknowledges the important or ensuring that our supply chain delivers products and services in a responsible and ethical manner that is consistent with the Company core values of innovation, transparency and integrity with our people and our clients at the heart of what we do.

The Company understands that there is always a risk regarding modern slavery and human trafficking in our supply chains. The environment is fluid and as the Driver business expands and changes over many geographies and industry sectors, including in locations where we do not have legal entities, any new link within the supply chain must meet our zero tolerance expectations that is set out in the company Business Conduct Policy including but not limited to any concerns of malpractice by employees, subcontractors, agency staff or business partners which may lead to:

- Commissions of a criminal offence
- Breach of legal obligations
- Risk to health and safety
- Damage to the environment
- Material financial exposure or risk to the Group
- Material breach of Group policies
- Deliberate concealment of any such matters





## POLICIES

### Human Resource Management (HRM)

Human Resource Management (HRM) involves co-ordinating, managing and allocating employees and subconsultants in ways that move organisational goals forward, focussing on investing in employees, ensuring safety and compliance and managing all aspects of staffing from recruitment to compensation and development whilst ensuring best working practices. Driver Group, in addition to its Modern Slavery and Human Trafficking Policy, exercises and regularly reviews robust human resources governance documents to help protect our employees and candidates from modern slavery and human trafficking and ensure that we are conducting business in an ethical and transparent manner. Such policies and procedures include:

- Inclusion and Diversity Policy
- Equal Opportunities Policy
- Domestic Violence Policy
- Business Conduct Policy
- Whistleblowing Policy

Driver Group HRM takes the following position on modern slavery and human trafficking:

- Permitting employees the right and choice to end their contractual relationship with the Company with appropriate notice
- Taking relevant copies of identity documents and never withholding originals, thereby allowing freedom of movement. In the UK, a third-party IDSP is used whereby the employee can upload a copy of their relevant documents
- Supporting, where applicable, the securing and renewal of work permits and visas to allow legal working and freedom to move between entities without limitation
- Ensuring freedom of association
- Paying wages in line with local laws and legislation ensuring direct and timely transactions, also ensuring there are no unlawful deduction from wages
- Absorbing the full cost of recruitment and placement of new candidates and financially supporting relocation costs should employees move within entities under the Driver Group umbrella
- Ensuring local laws and legislation are adhered to with regard to working time practices, such as the Working Time Directive and not abusing or enforcing overtime practices
- Respecting the right to worker representation and accompaniment where applicable
- Prohibiting human rights abuses, and any activities that encourage modern slavery, human trafficking, child labour, bonded labour, or forced labour and requiring our suppliers to do the same
- Behaving and act with employees and stakeholder in a manner that is regarded as trusted, transparent, and fair
- Offer platforms for employees to anonymously communicate with the HR department, C-Suite and Executive Board with any concerns, feedback, questions or concerns
- Regularly monitor and review employment practices, policies and procedures to ensure legislative compliance and best working practices.

## POLICIES



### RECRUITMENT PROCESSES AND POLICY

Driver Group operates a robust recruitment policy, including conducting eligibility to work checks for all employees to safeguard against human trafficking or individuals being forced to work against their wishes. In the UK in October 2022, the Company partnered with TrustID, a verified third-party Identity Service Provider (IDSP) to process right to work checks and ensure compliance and support statutory excuse. Our internal EuAm Recruitment Manager adheres to ISO Accredited recruitment, selection and mobilisation processes and works in collaboration with select external agencies to ensure transparency and best working practices including but not limited to ensuring no fees or costs of any kind are charged to the candidate, no documents are withheld, no people underage are employed, and candidates are provided with a clear contract of employment that complies with local legislation.

### SUSTAINABILITY

Driver Group considers sustainability an integral cog of our business strategy and includes this in its Corporate Social Responsibilities (CSR) Statement. The Company will ensure that its procurement policy for all equipment and materials purchases and services sought are from sustainable sources and suppliers with sustainable policies. The Company also has health and safety and environmental policies which will be adhere to over and above minimum standards and will encourage and train all employees to act responsibly when it comes to environmental matters and in always ensuring that safety comes first and promotes the highest standards of business conduct possible. Our staff are encouraged to engage positively in the local community, particularly where our skills set in construction can benefit local charities, schools and other organisation that have a community focus and where we may identify opportunities and risk associated with our projects.

### DUTY TO REPORT

The prevention, detection, and reporting of modern slavery in any part of Driver Group's business or supply chains, globally, is the responsibility of all those working for Driver Group or under Driver Group's control. Everyone is required to avoid any activity that might lead to a breach of this policy. Any person within our employment or sub-contracted to the Company that suspects a breach of, or conflict with, this statement has occurred or may occur must report it in accordance with the Whistleblowing Policy. If any person is unsure about whether a particular act, the treatment of workers or their working conditions within any of Driver Group's supply chains constitutes any of the various forms of modern slavery, it should be raised through the Whistleblowing Policy. Driver Group aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if their concerns turn out to be misplaced. Driver Group is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith a suspicion that modern slavery is, or may be, taking place in any part of its business or in any of its supply chains.

## DUE DILIGENCE



At Driver Group, we expect third parties we partner with to adhere to business principles and values similar to our own and to comply with all applicable laws and regulations. Before making any commitments towards third parties, we take steps to appropriately evaluate the relationship and mitigate any associated risks. A Conflict Check Form must be conducted in accordance with the Conflict Check Policy and Conflict Check Procedure, whether a commission is contentious or not, and regardless of the ongoing relationship with a client. Relevant checks should also be made on the ACT Global Database, as per the Company ACT User Policy. This global database includes clients on the Historic and Current job list to provide any background information and identify the client lead, other parties involved, other relevant relationships and information on past conflict or information relating to the client that may be in conflict with or contrast the business principles.

The Company Proposal Procedure should also be adhered to, to minimise the risks associated with potential conflicts and bad credit, to control the issuance, approval review, content and format of all proposals issued to prospective clients and to ensure consistency of proposals in form, appearance and output. New opportunities arise from a variety of difference sources, including enquiries from new or existing clients, speculative proposals, active business development and/or framework invitations. All opportunities will be recorded within an Opportunities Register together with details of the Client Contact, date of the submission and the Consultant dealing with the enquiry. A decision to submit a proposal would be subject to: conflict check, credit check, capacity and capability within the business, an assessment of the financial and reputational risk and alignment of the opportunity within the business plan.

The Company aims to maintain high ethical standards as set out in the Business Conduct Policy, which is mandatory for all employees and sub-consultants. Further principles as laid out in our Company policies and procedures include but are not limited to: anti-corruption and bribery, gifts and hospitality register, inclusion and diversity, equal opportunities and duty to report and how we deal with business partners.

## COMMUNICATION AND AWARENESS

Driver Group will raise awareness of modern slavery by emailing Driver Group's Modern Slavery and Human Trafficking policy to all employees on an annual basis as well as signposting to the Modern Slavery and Human Trafficking Statement on the Group's intranet and website. This policy will be communicated to all new employees, contractors, suppliers and business partners at appropriate points during our business relationship with them and reinforced as appropriate thereafter. Driver Group's zero tolerance approach to modern slavery must be communicated to all suppliers, contractors, sub-consultants and business partners when entering into new or renewed contracts with them.

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## FUTURE WORK

The Company will implement risk assessments should there be concerns of a particular part of the business and/or certain individuals or groups of individuals who should be considered at higher risk of modern slavery and human trafficking. Pending the outcome of risk assessments, corrective and preventative measures such as enhanced training would be discussed with the management, C-Suite and Executive Board and will be monitored by allocated people, to be identified in future circumstances.

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## DECLARATION

This statement, written for the financial year October 2023 – September 2024 is made by Driver Group and covers all of its subsidiary's companies.

It is published in accordance with the requirements of Section 54 of the Modern Slavery Act 2015 and is approved by the board.

**Signed**



**Position** Mark Wheeler, Chief Executive Officer

**Dated** 13 December 2023

