

Modern Slavery Statement

We have pledged our commitment to ensuring that Modern Slavery of any kind is not tolerated within our operations and supply chain.

Our Organisation Structure and Supply Chains

The Danbro Group comprises of trading entities that provide accountancy, payroll and financial services to contractors, freelancers and SMEs within the UK. In scope are Danbro Workforce Solutions Ltd, Danbro Employment Umbrella Ltd and Trafalgar Workforce Solutions Ltd. Our supply chain consists of recruitment agencies, other service professionals, general office suppliers, insurers, banks and utilities providers.

Slavery and Human Trafficking Policies

Our [Anti-Slavery and Human Trafficking Policy](#) reflects our commitment to acting ethically and with integrity in all our business relationships.

Due Diligence Processes

We have reviewed our processes and as a result we have implemented a number of different initiatives to ensure that:

- Systems and processes that hold employee and client information are secure, accurate and auditable
- We can more easily identify those who may be vulnerable, allowing us to check in on them. Our risk indicators include those:
 - Residing in a house with 4 or more other contractor employees;
 - Nationality noted as one of the Countries listed as high on the slavery index;
 - Individuals whose salary is paid into a bank account that is not in their own name
- We regularly review and update our agreements and contracts with suppliers ensuring that they are also committed to the abolishment of slavery and trafficking by ensuring compliance in their own business and subsequent supply chain
- All employees are paid at least the National Minimum Wage or National Living Wage and never working with businesses who try to avoid this
- We are compliant with Agency Workers Regulations which seeks to ensure no worker is paid less than a comparable directly employed individual doing a similar role
- We continually update our Anti-Money Laundering checks in line with new legislation which includes:
 - 2017 Money Laundering Regulations
 - 2002 Proceed of Crime Act (POCA) as amended by the Criminal Finances Act 2017
 - Terrorism Act 2000 as amended by the Anti-Terrorism, Crime and Security Act 2001
 - Other anti-terrorism legislation

Risk Assessment and Management

Risk Management is an important part of managing our operations and to help us to do effectively, we have introduced the following processes:

- Reviewing our Risk Register quarterly
- Centrally investigating, recording and alleviating all concerns received about Modern Slavery
- Raising awareness to those in our supply chain of their obligations in this regard
- Performing welfare checks on employees in our high risk categories
- Introduced a dedicated compliance team to properly investigate grievances and complaints, as well as working to driving up quality standards
- Introduced a [Whistleblowing policy](#) to ensure there is a secure channel for any protected disclosures

Training on Modern Slavery and Trafficking

As part of our commitment to increasing awareness of Modern Slavery, we have introduced the following training:

- Online Modern Slavery Awareness training for all employees on an annual refresher basis
- An induction programme for all new starters that includes Modern Slavery training
- Our Anti-Money Laundering training is included in our induction training for new employees and forms part of our mandatory annual refresher training programme

Our Commitment

In addition, the Danbro Group continue to be proud of our charitable support through The Danbro Foundation. Most significantly we underwrite the administration costs of Operation Orphan, a charity dedicated to supporting and protecting vulnerable children and orphans in the UK and across the world. If you would like to learn more about the excellent work that Operation Orphan does, or wish to get involved, please visit <http://www.operation-orphan.org/>.

We strive to do our bit to make the world a safer, more hospitable place for everyone; a world in which people can support themselves and their families, be paid fairly for the work they do without fear of harm or threat of harm.

Our focus this year will be to:

- Increase awareness of Modern Slavery and Human Trafficking through our supply chain by refreshing our message and our Approved Supplier Process
- Raise awareness of this issue in a blog post / news update to our contractor employees
- Continue to support and assist Operation Orphan to protect vulnerable children and orphans both in the UK and abroad

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group slavery and human trafficking statement for the financial year ending 31st March 2023.

Helen Broughton MBE DL
Chief Executive Officer