John Paul Construction

Anti-Slavery + Human Trafficking Statement

Background, Objective, and Scope

This statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015 and outlines the steps John Paul Construction has taken during the financial year ending 31 December 2026 to prevent modern slavery and human trafficking in our business and supply chains. This statement will be reviewed and updated annually.

Organisational Structure & Supply Chain

John Paul Construction is an international construction company operating across Ireland, the UK and Europe. We deliver projects across a range of sectors including Data Centres, Pharma/Life Sciences, Commercial, Residential, Healthcare, Civil Infrastructure, Energy/Renewables and Transport.

The company directly employs approximately 700 employees and works with an extensive network of subcontractors, suppliers and specialist partners throughout our operations and supply chain.

Management Systems and Compliance

Modern slavery considerations are embedded within our procurement, onboarding and supply chain management processes. Our Supply Chain partners are expected to have policies and procedures consistent with the requirements of our Supply Chain Code of Conduct, relevant EU/National Laws, and the 'UN Guiding Principles on Business & Human Rights'.

Our Commitment

At John Paul Construction, we firmly believe that success is not solely measured by financial outcomes but also by the ethical conduct of our business. Our company is founded on strong values and ethical principles, and as such, we adopt a zero-tolerance approach towards modern slavery, encompassing practices such as slavery, servitude, forced or compulsory labour, and human trafficking.

To uphold our commitment to transparency, compliance and continual improvement, we have established procedures that mandate our supply chain partners to adhere to this policy. All potential partners are required to familiarise themselves with this policy as part of our onboarding process before engaging in any business activities with us.

Our Business

We operate in the construction sector, delivering Data Centres, Pharma/Life Sciences, Industrial, Healthcare, Commercial & Retail, Fitout, Residential & Student Accommodation, Tourism & Leisure, Public, Transport, Energy/Renewables, and Civil Infrastructure. Our operations span Ireland, UK and Europe, and we work with a wide network of suppliers, subcontractors, and partners.

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Policies

We have embedded modern slavery consideration into the following key policies and procedures to support our commitment to ethical business practices:

- **Code of Conduct**: outlining expected business ethics and standards of behaviour for all employees and partners.
- **Supply Chain Code of Conduct**: setting out our expectations for ethical conduct, labour standards, and human rights across our supply chain. It includes a confidential reporting channel for stakeholder to report concerns.
- **Whistleblowing Policy**: providing a confidential channel for reporting concerns, including suspected modern slavery.
- **Anti-slavery & Human Trafficking Policy**: setting out our commitment to zero tolerance for modern slavery in all its forms (child labour, forced labour, human trafficking).
- **Sustainable Procurement Policy** – setting out our commitment to reducing environmental and social impacts the products and services we procure, including suspected modern slavery.
- **Environmental Health & Safety (EHS) Management System**: includes procedures for Bullying, Harassment and Discrimination (D6.26) and Disciplinary procedures (D6.27)
- **Equality, Diversity & Inclusion Policy**: outlining how we strive to create and maintain a culture where everyone feels included, valued and all human rights are respected.
- **Equality and Human Rights Policy**: outlines how we are committed to providing Equal opportunities and the promotion of Human Rights.

Systems and Guidance

Due Diligence and Risk Management

We assess the risk of modern slavery in our operations and supply chains through:

- Supply chain partner pre-qualification and onboarding processes
- Contractual requirements for supply chain partner compliance with modern slavery laws
- Ongoing supply chain partner assessments and audits where appropriate

Training and Awareness

We provide training to relevant staff to raise awareness of modern slavery risks and how to identify and report concerns. We communicate our expectations to supply chain partners to promote shared responsibility. We run awareness campaigns on all our sites and provide toolbox talks for our supply chain workforce to understand their rights. As partners of the Supply Chain Sustainability School, we actively encourage our employees and our supply chain partners to undertake e-learning on Modern Slavery and other ESG topics.

Monitoring and Continuous Improvement

We are committed to continuously monitoring, maintaining, and enhancing our policies and

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procedures to ensure ongoing compliance with the Modern Slavery Act 2015 and the EU Directive 2011/36 [Anti-Human Trafficking] by:

- Regular policy reviews
- Strengthening supplier engagement
- Enhancing transparency and reporting mechanisms

Approval

This statement has been approved by the Board of Directors of John Paul Construction and serves as a foundational commitment to combat modern slavery within our operations and supply chains, ensuring ethical conduct and upholding human rights across all aspects of our business.

Liam Kenny
Chief Executive Officer
Date: 18th November 2026