John Paul Construction

Anti-Slavery + Human Trafficking Policy

Background, Objective, and Scope

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 principles, and we adopt a zero-tolerance approach towards all forms of modern slavery, including slavery, child labour, servitude, forced or compulsory labour, and human trafficking.

We recognise the inherent risks associated with modern slavery and human trafficking and acknowledge our responsibility to prevent such practices within both our operations and our supply chains. This policy is made pursuant to the UK Modern Slavery Act 2015, the EU Directive 2011/36 [Anti-Human Trafficking] and Ireland's Criminal Law (Human Trafficking) Act 2009 as amended by the Criminal Law (Human Trafficking) (Amendment) Act 2013.

To uphold our commitment to transparency and compliance, John Paul Construction has established a robust framework of policies, including:

- **Code of Conduct**: outlining expected business ethics and standards of behaviour for all employees and partners.
- **Supply Chain Code of Conduct**: requiring all partners to uphold ethical standards and human rights.
- **Sustainable Procurement Policy**: obliging partners to confirm understanding and ad¬herence before engagement.
- **Whistleblowing Policy:** informing workers of how they can confidentially and securely report matters of wrongdoing, including through the Company's confidential reporting system, available at https://johnpaul.integrityline.com/.
- **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.
- **Human Rights Due Diligence Policy**: outlines how we are committed to providing equal opportunities and the promotion of Human Rights.

Guidance

Supply Chain

We are committed to ensuring our supply chain is free from modern slavery and to achieve this, we:

- Require our suppliers to demonstrate compliance with our Supply Chain Code of Conduct.
- Conduct risk-based assessments of our new and existing suppliers.
- Reserve the right to audit our supply chain partners where necessary.

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We actively encourage employees, suppliers, and contractors to report any suspected instances of modern slavery. Reports can be submitted confidentially in line with our Whistleblowing Policy and will be investigated promptly and fairly.

We provide awareness training to our own workforce and our subcontractor workforce to help identify the signs of modern slavery and human trafficking. This ensures our teams know how to respond and report any concerns appropriately.

Our recruitment processes are designed to be transparent and ethical. We apply the same standards to our recruitment partners, ensuring that no worker is subjected to forced or exploitative practices.

John Paul Construction is committed to continually monitoring, maintaining, and enhancing our approach. We review our policies annually to ensure ongoing compliance and effectiveness. To achieve this, we are committed to:

- Strengthening due diligence processes across international operations.
- Delivering enhanced modern slavery training for our site management teams.

This policy has been approved by the Board of Directors of John Paul Construction and is signed on its behalf. It will be reviewed and updated annually.

Liam Kenny
Managing Director
Date: 18th November 2026