

# Supply Chain Code of Conduct

## Background, Objective, and Scope

At John Paul Construction (JPC), we are committed to ethical sourcing and to minimising negative environmental and human rights impacts across our supply chain. As part of our Responsible Sourcing Programme, we embed our Sustainable Procurement Policy throughout all areas of our operations. A core element of this programme is our Supply Chain Code of Conduct, contained herein. This Code defines the minimum standards and expectations that every supply chain partner must meet in order to do business with John Paul Construction. It sets out the principles and requirements that our partners are expected to uphold when working with us, ensuring that together we operate responsibly, sustainably, and with integrity.

## Environmental Requirements

### Energy, Climate and Decarbonisation

Supply chain partners are expected to actively work to minimise lifecycle carbon emissions provide relevant data as requested and support JPC to achieve our climate strategy and decarbonisation goals. For subcontractors, this includes compliance with our Energy Management System and any project specific requirements, where required.

### Ecological Impact and Biodiversity

Supply chain partners are expected to minimise ecological impacts associated with land-use change by reducing reliance on virgin material extraction, applying circular economy principles, and auditing our high impact commodities (cement, sand, steel, timber). For subcontractors, this includes compliance with our Environmental Management System and any project specific requirements to prevent adverse impacts on biodiversity and ecological systems.

### Pollution of Water and Soil

Supply chain partners must carefully manage materials and activities that could pollute water or soil, both upstream and on-site. Subcontractors must comply with our Environmental Management System and project-specific requirements, with particular attention to the control, storage, and handling of harmful chemicals such as fuels, oils, lubricants, paints, coatings, and other construction materials.

### Waste Management and Circular Economy

Materials, products, and services being sourced for our sites should align with circular economy principles, where possible. For subcontractors, this includes compliance with our on-site efforts to prioritise waste avoidance and minimisation. All hazardous waste must be properly identified, stored, and managed in line with legal and environmental requirements. Single-use plastics and packaging should be minimised and use take-back schemes where appropriate (e.g. pallets).

### Water Stewardship and Conservation

Supply chain partners must implement sustainable water stewardship practices across their operations. For subcontractors, this includes compliance with our on-site water conservation efforts and to minimise unnecessary water withdrawals, where possible.

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## **Social and Human Rights Requirements**

### **Health and Safety**

Supply chain partners must demonstrate a commitment to maintaining and continually improving a culture of safety excellence across all worksites. This includes adherence to industry-leading safety practices and achievement of high-performance safety metrics. For subcontractors, compliance with our Work Safe, Home Safe programme is mandatory.

### **Modern Slavery**

Supply Chain partners should have a policy in place in line with the UK Modern Slavery Act 2015 and/or EU legislation [Directive 2011/36 - Human Trafficking], whichever is applicable. Supply chain partners are expected to take actions to ensure all forms of Modern Slavery, including Human Trafficking, Forced Labour and Child Labour do not occur in their own operations and those of their supply chain.

### **Working Conditions, Wages and Employment Practices**

Employment must be based on legal, fair, and secure contracts, and all workers must be paid at least the minimum pay rates and entitlements - as legally required in the jurisdictions they operate. Supply chain partners are expected to uphold ethical employment practices that ensure dignity and security for all workers.

### **Fairness, Inclusivity and Respect**

Supply chain partners must actively promote Fairness, Inclusivity and Respect (FIR) in their workforce, ensuring workplaces are free from discrimination, bullying, and harassment, while supporting diversity, creating local jobs and workforce development through training and apprenticeships.

## **Governance Requirements**

### **Ethical Business Conduct**

Supply chain partners must conduct business with the highest standards of integrity and transparency. Robust anti-bribery and anti-corruption measures must be in place, with zero tolerance for any form of unethical behaviour, including fraud, bribery, or coercion.

### **Legal and Regulatory Compliance**

Full compliance with all applicable local, national, and international laws and regulations is always required. This includes, but is not limited to, laws related to employment, health and safety, environmental protection, and corporate governance.

### **Supply Chain Management and Responsible Sourcing**

Supply chain partners must ensure timely payments and fair contract terms across their supply chains and maintain sustainable procurement policies that uphold environmental and ethical sourcing principles.

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## **Commitment to Industry Best Practice**

Supply chain partners are expected to demonstrate a commitment to industry best practice by training and upskilling their workforce to tackle key sustainability issues. JPC are partners of the Supply Chain Sustainability School ([www.supplychainschool.ie](http://www.supplychainschool.ie)) and our supply chain workforce are required to register on the school and undertake relevant learning modules, in the form of tool-box talks.

## **Additional Requirements for High Impact Commodity Supply Chain Partners**

Within our supply chain, John Paul Construction has identified four commodities—timber, cement, steel, and sand—as having particularly high environmental and social impacts, in line with the Science Based Targets Network’s High Impact Commodities List. Due to their elevated impact, we have the following additional requirements for supply chain partners supplying these materials to our sites:

- » **Timber:** For timber products, we may require supply chain partners to demonstrate that materials are responsibly and legally sourced. All timber-based products delivered to our sites must comply with the EU Deforestation Regulation (EUDR). JPC prioritises timber with responsible sourcing certifications, such as FSC, PEFC, SFI, or other internationally recognised standards.
- » **Cement:** For cement-based products, we may require supply chain partners to provide due diligence information and Environmental Product Declarations (EPDs) detailing the product’s origin and carbon emissions data.
- » **Steel:** For steel-based products, we may require supply chain partners to provide due diligence information and Environmental Product Declarations (EPDs) showing the product’s origin and carbon emissions data. JPC prioritises steel manufactured with recycled content, produced using electric arc furnaces, and certified through responsible sourcing schemes such as CARES, BES6001, or ResponsibleSteelTM.
- » **Sand:** For sand-based products, we may require supply chain partners to provide due diligence information and Environmental Product Declarations (EPDs) that include the product’s origin and any recycled content.

## **Management Systems and Compliance**

Supply Chain partners are expected to have policies and procedures consistent with the requirements of this Supply Chain Code of Conduct, relevant EU/National Laws, the ‘UN Guiding Principles on Business and Human Rights’ and ILO Standards.

Supply Chain partners are expected to have robust management systems in place to ensure due diligence, risk management, training and continuous improvement of their policies and procedures.

Supply chain partners are expected to provide us with information on their management systems and compliance if requested.



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Non-compliance with the requirements of this Code of Conduct could lead to corrective action plans and may in extreme cases lead to termination of contracts or failure to renew contracts.

Should any of the requirements of this Code be violated, a concern should be reported via [compliance@johnpaul.ie](mailto:compliance@johnpaul.ie). All reports are strictly confidential and handled by trained persons, in line with relevant legislation.

A handwritten signature in blue ink that appears to read "Liam Kenny".

**Liam Kenny**  
Managing Director

Date: 25<sup>th</sup> October 2025

