
Modern Slavery Statement

Overview

PJ Hegarty & Sons UK ("PJ Hegarty" or the "Company") are committed to preventing any form of modern slavery and human trafficking in our operations and supply chains. We recognise that modern slavery is a serious violation of human rights and encompasses forced labour, human trafficking, and other forms of exploitation (including the exploitation of children). This policy sets out our commitment to combatting modern slavery in all its forms and ensures transparency in our practices which we align with the principles outlined in the *Modern Slavery Act 2015*.

Purpose

The purpose of this Statement is not only to comply with our statutory obligations, but also to ensure that all employees, suppliers, and other partners understand our commitment to preventing modern slavery and to establish a framework for identifying and addressing potential risks within our operations and supply chains.

Organisation

PJ Hegarty operates throughout the UK in the construction industry, specialising in the civils and industrial sectors. We aim to ensure our projects create sustainable environments and we are committed to integrity, transparency, and ethical and responsible business practices.

Working with PJ Hegarty

PJ Hegarty has a range of policies covering our efforts to ensure that we have a workplace that is diverse, inclusive, and free from any form of discrimination. The Company has zero tolerance for harassment or discrimination based on age, disability, gender reassignment, marriage or civil partnership, pregnancy and maternity, race (including colour, nationality, ethnic or national origin), religion or belief, sex, and/or sexual orientation, or based on any other discriminatory ground. We are consistently trying to improve on our metrics for underrepresented groups, particularly at senior management level. This includes our efforts in embracing diversity throughout our hiring process at all levels and educating relevant employees on unconscious bias and how to prevent it.

In addition, we respect our employees' privacy rights and ensure appropriate protections (including policies and processes) are in place for the careful processing of their personal information.

Supply Chain

Suppliers to the organisation are primarily based in the UK or Europe. The relevant countries are deemed low risk for human rights abuse potential, but we must be cognisant of where our suppliers source their products and materials (geographically) and who their supply chain partners might be. Therefore, we acknowledge that there may be a risk of human rights abuses further down the supply chain, considering that manufacturing, metal and material refinement, as well as mining industries, have a theoretically high human rights abuse potential. However, we strive to understand the deeper supply chain through the various processes described throughout this Statement.

Our Commitment

We are committed to acting ethically and transparently in all our business dealings. We strive to ensure that our employees and those in our supply chains are treated with respect and dignity, and we do not tolerate any form of modern slavery, labour exploitation, or human trafficking. Our commitment also includes:

- Zero tolerance: we have a zero-tolerance approach to modern slavery and human trafficking. We will not tolerate any form of exploitation or abuse within our business or supply chains.
- Compliance with laws: we are committed to complying with all applicable laws and regulations regarding human rights and labour practices, including the *Modern Slavery Act 2015* as may be amended, working time laws, and any other relevant laws that are applicable to our operations.
- Supply chain expectations: we expect our suppliers, subcontractors, and partners to adhere to the same high standards of ethical conduct and to implement practices that prevent modern slavery in their operations, and we have developed a comprehensive responsible sourcing code for our suppliers and subcontracts requiring that they confirm their commitment to these standards. PJ Hegarty will not work with any supplier, subcontractor or other partner who either does not meet or breaches these standards.
- Free movement of workers: The Company is committed to ensuring that individuals who work for or on behalf of the Company are free to change their employment at will upon giving the appropriate contractual notice without fear of retribution or financial penalty and are not restricted to do so by virtue of their ethnicity or nationality.

Due Diligence Processes / Responsible Sourcing Strategy

We view the relationships with our suppliers as an opportunity to share learnings so that both the Company and our subcontractors/suppliers can maintain best practices and we aim to do business only with subcontractors/suppliers who share our core values particularly with regard to human rights, inclusion and diversity, environmental sustainability, and ethical governance.

In 2023, the organisation commenced a thorough review of its supplier/sourcing strategies, and we developed a short-term 'responsible sourcing strategy' applicable across the business. This strategy was for the purpose of reviewing purchasing practices to ensure that such practices are ethical, sustainable, and socially responsible. To this end, the Company's supplier base was categorised having regard to spend and supplier type (type one: **vendor** (supplying products/materials), and type two: **subcontractors** (providing services)).

Last Reviewed: August 2024

Between 2023 and 2024, the organisation determined its top strategic suppliers. As part of the short-term responsible sourcing strategy, the organisation has been focusing its engagement with its top 76 suppliers (which accounted for 70.03% of the company's overall spend with vendors from October 2019 to October 2023 and 68.9% spend with subcontractors during the same period).

In early 2024, these top 76 suppliers were issued with an ESG Questionnaire, the purpose of which was twofold: (i) to assess our suppliers' ESG maturity; and (ii) to develop our engagement with our suppliers on important ESG matters. The topics included in the Questionnaire were influenced by PJ Hegarty's internal sustainability framework and the results of the organisation's sectoral-based human rights and environmental impact assessment. The results of this Questionnaire were used to assist PJ Hegarty in prioritising topics for supplier engagement.

Following the return and analysis of the responses to the Questionnaire, the organisation (in liaison with its external subject matter expert advisors) held two workshops with the key suppliers. The three key topics for discussion at these workshops were identified from the results of the Questionnaire, one of which was modern slavery (including high risk human rights topics, forced labour, child slavery, and human trafficking). In these workshops and in follow up engagement, PJ Hegarty has requested that all these suppliers should have a modern slavery policy in place by the end of 2025 and should also complete the 'Introduction to Modern Slavery' training provided by the 'Sustainability Supply Chain School'.

Assurance procedures are essential to ensuring that our subcontractors and suppliers uphold the standards required by the Company. The following gives an outline of the procedures we employ:

- Evaluation: prior to engaging with new subcontractors and suppliers, we aim to assess compliance with the principles in our responsible sourcing code;
- Contractual commitments: our contracts include clauses outlining obligations to comply with our Code, relevant laws and regulations, and industry standards;
- Monitoring and auditing: PJ Hegarty reserves the rights to audit our suppliers;
- Engagement: we engage with our subcontractors and suppliers to enhance their understanding of our requirements and their ability to comply;
- Reporting: we have a mechanism in place for reporting and responding to concerns relating to supplier and subcontractor compliance.

Risk Assessment and Management

Construction is the second highest-risk sector for forced labour with an estimated 4.5 million construction workers in forced labour around the world. Further, 18% of all victims of forced labour work in the construction sector (International Labor Organisation, 2017).

In 2024, PJ Hegarty conducted a sectoral-based impact assessment to identify potential human rights and environmental adverse risks and impacts within our supply chain. It is the organisation's view that making purchasing choices without due consideration for ethical and sustainable practices can lead to adverse environmental and human rights impacts. If human rights are not considered as a factor in the decision-making process, it can perpetuate labour exploitation, including child labour, forced labour, poor working conditions, and unfair wages, often within vulnerable communities.

By undertaking this sectoral-based impact assessment, PJ Hegarty can understand better the potential adverse impacts we might have on the environment and human rights indirectly through our supply chain.

For the purposes of this assessment, we broke down our high-legal supply chain map into two categories:

- (1) primary material sourcing, i.e., material and services that directly relate to the product or service we are providing; and
- (2) supporting services, i.e., the sectors and services that support the business and corporate level business function.

Furthermore, it was deemed likely that the material impacts would be found in the first category (primary material sourcing) as opposed to the second category (supporting services¹) and therefore follow up investigation focused on the former category.

To identify areas where human rights impacts were likely to arise, a sectoral screening was undertaken using the United Nations Environment Programme (UNEP) Human Rights Guidance Tool for the Financial Sector. This Tool sets out applicable guidance on identifying and addressing social issues relevant to the sectors with the supply chain, highlighting relevant international laws, standards and initiatives. Following this, health & safety, workplace conditions, child labour, forced labour, security, threats to livelihoods of local communities, and ethical sourcing have been identified as the common potential areas of human rights abuses within the PJ Hegarty supply chain. The risks in these categories can vary in likelihood depending on the region, the type of material or product and the practices of the suppliers involved.

At group level, the organisation then undertook a web-based supplier risk screening for a sample of 20 of its strategic suppliers, ten vendors and ten subcontractors, to assist the organisation in assigning a baseline supplier ESG risk level, from publicly available information. This risk screening process was informed by the supplier's trading name, the percentage (%) of spend for the previous year

¹ Support services for PJ Hegarty are typically geographically based in low-risk human rights countries as determined using the UNEP Geographical Risk List and also generally have a lower human rights impact potential. However, we will keep this position under review

across the organisation (screening those representing our highest spend), and product category (e.g., steel, copper, transport, cable, etc.), and vendor type (distributor or manufacturer).

As this screening was undertaken using publicly available information, we were able to identify that we should improve the transparency of our suppliers' own supply chains and we have sought to address this with the introduction of a responsible sourcing code (see below), which was socialised with many of our key suppliers.

Policy Development

PJ Hegarty believes that having policies and codes on social and environmental topics that apply to procurement and/or supplier practices are crucial components of good corporate governance and enhanced sustainability efforts. Such policies establish ethical guidelines and standards to which suppliers and purchasing teams should adhere, ensuring fair labour practices, respect for human rights, and environmental sustainability throughout the supply chain. Consequently, PJ Hegarty has, throughout 2023 and 2024, made positive strides in reviewing its supply chain and updating its supplier policies including the introduction of the responsible sourcing code to which all suppliers and subcontractors must confirm compliance going forward. Amongst other things, that code includes requirements relating to labour practices, human rights, and transparency.

Monitoring

PJ Hegarty has built an extensive network of well-established and reputable suppliers and subcontractors which whom we maintain strong relationships. Before entering any commercial relationship with them, we assess the suppliers and/or subcontractors, including assessing whether there is a vulnerability to modern slavery. Part of our assessment will include an evaluation of the supplier's or subcontractor's labour practices and, throughout our relationship with them, we strive to ensure compliance with our policies and standards.

Speaking up

We encourage all employees and stakeholders to report any concerns regarding modern slavery or human trafficking and we have established a protected disclosures policy that allows individuals to report concerns confidentially and without any fear of retaliation. The process for speaking up has been reiterated in our responsible sourcing code.

Statement of commitment

This statement is made to reflect our commitment to preventing modern slavery in all forms either within our operations or our supply chains. We are committed to continuously improving our practices to combat modern slavery and human trafficking in our business and supply chains, and to ensuring that our business practices uphold the highest standards of human rights.

This statement has been approved by the Board of Directors of PJ Hegarty & Sons UK and will be reviewed annually to ensure its effectiveness and relevance.



Signed:

Barry Dodd

UK Operations Director

13 August 2024

This statement reflects our commitment to transparency and accountability in our efforts to prevent modern slavery and human trafficking. We welcome feedback and encourage anyone with concerns to contact us directly.

Last Reviewed: August 2024