



# Responsible Sourcing Code

2024





## INTRODUCTION

At PJ Hegarty & Sons ("PJ Hegarty" or the "Company"), we are committed to conducting our business in a manner that upholds the highest standards of ethics, integrity, and social responsibility. As a reputable company in the construction industry in Ireland and the UK, we recognise the significant impact our activities can have on the environment, communities, and individuals involved in our supply chain.

We are committed to sourcing products, materials, and services in a way that endorses and encourages environmental sustainability and stewardship, respects and promotes human rights and social responsibility, and, where possible, supports community based smaller and more diverse businesses.

Central to our commitment to responsible business conduct is the establishment and enforcement of this Responsible Sourcing Code ("Code"), that applies to all of our subcontractors and suppliers. This Code outlines the minimum standards we require our subcontractors and suppliers to meet when conducting business with us. We believe that by setting clear expectations and promoting ethical behaviour throughout our supply chain, we can create a more sustainable and inclusive construction industry that benefits not just our stakeholders, but society as a whole.



## ETHICAL BUSINESS PRACTICES

We expect all our subcontractors and suppliers to uphold the highest standards of integrity, honesty, and transparency in their business dealings. This includes complying with all applicable laws and regulations, as well as adherence to ethical principles in their interactions with employees, customers, and other stakeholders as outlined in this Code. At a minimum, we expect our subcontractors and suppliers to:

- 1** not engage in any form of bribery, corruption, extortion, or fraudulent practices in their dealings with our employees, clients, government officials, and/or other stakeholders;
- 2** avoid conflicts of interest that could compromise their ability to act in the best interests of the Company and to disclose any actual or potential conflicts of interest, or relationships that might result in a perceived conflict of interest, as well as taking appropriate action to mitigate or resolve them;
- 3** compete fairly and ethically and refrain from engaging in anti-competitive practices such as price-fixing, bid-rigging, market allocation, or other conduct that restricts competition;
- 4** respect the intellectual property rights of others and ensure protection of the Company's confidential information, trade secrets, trademarks, copyrights, and patents and only use this information for authorised purposes;
- 5** protect the privacy and security of any personal and sensitive information and implement appropriate measures to safeguard against unauthorised access, disclosure, or destruction, etc.;
- 6** provide accurate and transparent information pertaining to their business practices, performance, and supply chain upon request by PJ Hegarty as well as disclosing any potential risks or non-compliance issues that may impact PJ Hegarty's operations or reputation;
- 7** demonstrate a commitment to social responsibility by supporting sustainable and ethical practices in their operations, supply chains, and communities and by respecting human rights;
- 8** exercise due diligence when engaging third parties, such as agents, consultants, distributors, and subcontractors, to ensure their compliance with this Code and applicable laws and regulations.



## HUMAN RIGHTS

Subcontractors and suppliers shall uphold the principles of non-discrimination and equal opportunity in all aspects of their operations and shall not use any form of forced, compulsory, or involuntary labour, including human trafficking, either within their operations or supply chains. At a minimum, subcontractors and suppliers are expected to:

- 1** adhere to the legal minimum age requirements and not employ any person below the minimum age as established by applicable laws and regulations;
- 2** respect the rights of workers to freedom of expression and privacy and not engage in any form of harassment, intimidation, or retaliation against workers who exercise their rights to voice grievances, provide feedback, or participate in lawful activities;
- 3** engage with local communities, as appropriate, in a respectful and transparent manner;
- 4** strive for transparency in their supply chains to prevent and address any potential human rights risks or violations;
- 5** monitor and evaluate their human rights performance, identify areas for improvement, and take appropriate corrective actions in a timely manner;
- 6** report any suspected or confirmed human rights violations to the appropriate authorities (and where it may impact the Company, report the matter to us), and cooperate with investigations as required by law.





## LABOUR PRACTICES

Subcontractors and suppliers must uphold fair and ethical labour practices ensuring that all workers in their value chain are treated with dignity and respect, including:

- 1** prioritising the health, safety and wellbeing of workers by providing a safe and healthy working environment;
- 2** complying with all applicable labour laws, including those related to working hours, fair compensation (competitive wages and other benefits) in accordance with industry standards;
- 3** prohibiting the use of child labour or forced labour, including human trafficking, and putting steps in place to identify and mitigate any such risks;
- 4** respecting the rights of workers to freedom of association, and freedom of movement on giving appropriate notice;
- 5** promoting diversity and inclusion within their organisations, fostering an inclusive workplace environment, and ensuring fair treatment of all workers regardless of age, disability, family status, gender, marital status, race (including colour, nationality, ethnic or national origin), religion, sexual orientation, or being a member of the travelling community, or any other protected characteristic;
- 6** ensuring any of their subcontractors and suppliers adhere to the same labour practices outlined in this Code;
- 7** establishing effective grievance mechanisms that allow workers to raise concerns which can be assessed, without fear of retaliation.



## ENVIRONMENTAL SUSTAINABILITY

As part of our commitment to environmental sustainability, and in alignment with the Corporate Sustainability Reporting Directive (CSRD), we recognise our responsibility to minimise the environmental impact of our business, including through our sourcing activities. As part of these efforts, subcontractors and suppliers who engage with the Company must:

- 1** comply with all applicable environmental laws, regulations, and standards, which includes obtaining necessary permits and approvals pursuant to environmental requirements;
- 2** implement effective waste management practices, including recycling, reuse, and proper disposal of waste materials, striving for zero waste to landfill;
- 3** strive to measure, manage, and reduce their carbon footprint and to use renewable energy sources, working towards the reduction of greenhouse gas emissions and air pollutants;
- 4** respect and protect biodiversity and ecosystems, minimise habitat destruction, where possible avoid deforestation and land use change, and consider biodiversity conservation measures in their project planning and execution;
- 5** prioritise the use of sustainable materials and products, including selecting materials with lower environmental impacts, such as certified sustainable timber, recycled materials, and energy-efficient products;
- 6** be transparent about their environmental performance and impacts and provide relevant environmental data upon request from the Company including on energy consumption, emissions, waste generation, and environmental incidents;
- 7** continuously seek to improve their environmental performance and actively seek opportunities to reduce their environmental footprint.



## TRANSPARENCY

Transparency is fundamental to fostering trust, accountability, and responsible business conduct with our supply chain and therefore we expect our subcontractors and suppliers to:

- 1** maintain open and honest communications with us regarding health and safety and other business practices, policies, and performance which includes promptly responding to any request from the Company for information;
- 2** maintain accurate and transparent financial records and disclose any potential financial risk or liability that may affect their ability to fulfil any contractual obligation;
- 3** provide visibility into their supply chains, including sources for raw materials, components, and services used in their operations;
- 4** disclose relevant information on environmental and social impacts, including efforts to minimise environmental footprint, promote sustainable practices, and support social responsibility initiatives;
- 5** disclose any conflict of interest, actual or potential, and/or any ethical concern or violation having regard to this Code and/or relevant laws or regulations;
- 6** be able to demonstrate compliance with all applicable laws, regulations, and industry standards and provide such evidence as may be reasonably requested by PJ Hegarty.

## CONTINUOUS IMPROVEMENT

Subcontractors and suppliers should strive for continuous improvement in their business and transparency practices, including social and environmental performance. They are encouraged to engage with PJ Hegarty to identify opportunities for collaboration, innovation, and mutual benefit including actively seeking feedback as well as implementing corrective actions to address any deficiencies that may arise.



## ASSURANCE PROCEDURES

Assurance procedures are essential to ensuring that our subcontractors and suppliers uphold the standards outlined in this Code and the following gives an outline of the procedures we employ.

- 1** Evaluation: prior to engaging with new subcontractors and suppliers, we assess compliance with the principles in this Code.
- 2** Contractual Commitments: our contracts include specific clauses outlining obligations to comply with this Code, relevant laws and regulations, and industry standards.
- 3** Monitoring and Auditing: PJ Hegarty reserves the right to audit compliance with this Code.
- 4** Engagement: we engage with our subcontractors and suppliers to enhance their understanding of this Code and their ability to comply with its requirements.
- 5** Reporting: we have a mechanism in place for reporting and responding to concerns relating to supplier and subcontractor compliance with this Code.

## CORRECTIVE ACTIONS

The Company expects all subcontractors and suppliers to familiarise themselves with this Code, integrate its principles into their operations, and ensure compliance throughout their supply chain. In the event of a breach of this Code, the Company will take prompt and appropriate corrective action to address the issue.

## REPORTING CONCERNS

We encourage all employees, subcontractors, suppliers, and other stakeholders to report any suspected violations of this Code. Reports can be made to a member of our management team, a Director of the Company, or a member of our HR team. All reports will be treated in the strictest confidence and will be appropriately investigated.

The Company has a strict non-retaliation policy that prohibits any form of retaliation against individuals who report concerns or who cooperate with investigations into alleged violations of our Code. Any reported acts of retaliation will be promptly investigated and addressed.





## CONCLUSION

By adhering to this 'Responsible Sourcing Code', our subcontractors and suppliers demonstrate their commitment to shared values and principles of responsible business conduct. We believe that by working together with our partners, we can achieve our collective goals of sustainability, integrity, and excellence in the construction industry.

Many of the Company's clients will require compliance with their own supply chain codes of conduct. In this regard, the Company as well as its subcontractors and suppliers will be required to comply with those codes. Our subcontractors and suppliers must therefore read any relevant client code and this Code as cumulative.

We will keep this Code under review and make further improvements to it where we believe this can lead to better business practices. Together, let us build a brighter, more sustainable future for the construction industry and for the communities we serve.





# Hegarty

Building Contractors



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