

HUMAN RIGHTS POLICY STATEMENT

Objective:

Adopting this human rights policy statement is a precursor to our company's human rights due diligence towards meeting its responsibility to respect human rights. It is meant to send a clear signal to internal and external stakeholders, that the company is striving to embed human rights into its operational policies and procedures and to understand the human rights impacts of the business, both positive and negative. It also signals a commitment to take respect for human rights sufficiently seriously, to allocate management time and resources to developing and implementing the policy.

J Coffey Construction is committed to developing an organisational culture, which implements a policy of support for internationally recognised human rights and seeks to avoid complicity in human rights abuses. As a statement of commitment, we support the principles contained within the following:

- The Universal Declaration of Human Rights.
- The International Covenant on Civil and Political Rights.
- The International Covenant on Economic, Social and Cultural Rights.
- The International Labour Organization's (ILO) Declaration on Fundamental
- Principles and Rights at Work.

Applying the Policy:

J Coffey Construction recognises that achieving these standards presents unique challenges in various parts of the world. Going forward together with our suppliers, our intention is to drive towards the adoption of these, or comparable standards by our suppliers for their own operations, and those of their suppliers in turn by monitoring adherence by key suppliers in emerging markets to environmental, health and safety standards, prohibitions against forced and child labour, and local wage and hour laws. Evaluating human rights issues involving our direct business partner, particularly in emerging market and considering practical responses within the relevant context.

We seek to establish relationships with entities that share the same principles and values as J Coffey Construction. We also promote human rights awareness and respect along our value chain, in cases in which such measures are not taken, we then are entitled to rescind the respective commercial relationship.

Provision of Human Rights for Workers:

We respect everyone's human rights and will not discriminate based on race, colour, religion, creed, sex, age, social status, family origin, physical or mental disability or sexual orientation, nor will we commit other violations of human rights. Such discrimination will not be tolerated. We will be resolute in upholding human rights in everything we do and will not tolerate such discrimination in others. Ignorance and inaction do not constitute excuses for discrimination.

J Coffey Construction Limited is committed to and encourages collaboration with organisations that support Fair Trade and operate non-exploitative employment practices in their own businesses and supply chains throughout the world.

Freedom of Association/Collective Bargaining:

The Company respects our employees' right to join, form or not to join a labour union without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognised union, we are committed to establishing a constructive dialogue with their freely chosen representatives. The Company is committed to bargaining in good faith with such representatives.

| Human Rights Policy Statement (Attachment 1.9a) | Page 1 of 2 | Revision 02 – 08.01.25 |
|--|-------------|------------------------|
| Uncontrolled Copy when printed or downloaded from the company intranet | | |



Working Conditions:

We will treat all employees fairly and honestly regardless of where they work. All staff will have a written contract of employment, with agreed terms and conditions, including notice periods on both sides. All staff are entitled to reasonable rest breaks, access to toilets, rest facilities and portable water at their place of work, and holiday leave in accordance with the legislation of the country where they work. All employees are provided with appropriate job skills training.

Strict adherence to the Group's Health & Safety Policy is expected of every employee.

This policy statement applies to all employees and other personnel engaged in J Coffey Construction operations:

Signed: £ddie Barrett (Original Signed)

Date: 09/01/2025

Eddie Barrett

Group Managing Director

On behalf of J. Coffey Construction