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2026

Responsible Business Sourcing Policy



Background, Objectives, and Scope of the Policy

McKeon Contech Limited (t/a McKeon Group, and Hereworks), and Hereworks (UK) Limited (herein referred to as "the Company") is a Multidisciplinary Contractor offering Construction and Smart Building Solutions. The Company acknowledges that significant environmental and social impacts are associated with supply chains across the construction and building services sector. Environmental impacts related to climate change, waste, pollution, and land-use change are recognised within the sector. Negative social impacts, including those relating to health and safety, child and forced labour, and corruption and bribery, are also identified at an industry-wide level.

In accordance with our company-wide Responsible Business Framework and with respect to global frameworks and standards such as the United Nations Guiding Principles and the OECD Guidelines for Multinational Businesses, this Responsible Sourcing Policy (herein referred to as "the policy") outlines the Company's commitments to sustainable procurement.

This policy applies to all of the Company's activities and operations, including McKeon Group and Hereworks divisions, and to procurement for all projects conducted by the Company. All categories of purchases are within the scope of the policy, and all employees and business units must always adhere to it when making procurement decisions.





The Company's Commitments to Responsible Sourcing

To support the implementation of these responsible sourcing objectives, the Company holds the following commitments with regard to our purchasing practices:

- **Regulatory Compliance:** We will ensure that we comply with all applicable regulatory requirements related to the environment, governance, and labour standards, in all sectors and geographies in which we operate.

- **Transparency:** We will ensure that we operate in a transparent and honest manner and commit to providing the highest levels of integrity and trust to our suppliers. We will make efforts to ensure that our supply chain is as visible and transparent as possible.

- **Impact Identification and Action:** We will endeavour to adopt an impact-based approach to our sourcing and pay particular attention to products and suppliers that operate in and are commonly linked to high environmental and social impacts. Namely, these include steel, sand, cement, and timber for our construction supply chain, and providers of conflict minerals in our audiovisual solutions and smart building technology supply chains.

- **Environmental Stewardship:** We will consider the environmental impact of all our purchasing decisions, and endeavour to give preference to products with a lower environmental impact than their viable alternatives, and suppliers/subcontractors who can demonstrate higher environmental commitments in their own operations.

- **Human Rights Protection:** We will work with our suppliers/subcontractors and employees to ensure awareness of the impacts and risks of modern slavery, and that high labour standards are upheld within our suppliers' own activities. Health and Safety is a priority to the Company, and we will ensure that all subcontractors and construction workers are covered by Health and Safety policies and procedures.

- **Supplier Engagement and Partnership:** We will make efforts to collaborate with our direct suppliers/subcontractors to ensure awareness of responsible sourcing topics and work together with them to ensure our supply chain is as ethical and sustainable as possible. This collaboration may include training, knowledge sharing, and continuous communication on sustainability through meetings, contract renewals, and ongoing correspondence.

Going forward, the Company will continue to develop our responsible sourcing strategy and will work towards further actions with our suppliers/subcontractors, such as setting supplier expectations for taking action on environmental and social matters (including packaging and waste) and may put in place corrective actions for failure to adhere to the standards laid down in our responsible sourcing strategy.

What the Company Expects from its Suppliers

- **Compliance:** Comply with all applicable environmental and social legal requirements, in all territories in which you (viz., the supplier/subcontractor) conduct business activities.
- **Provide Data:** Upon request, provide the Company with data and information regarding your environmental, social, and governance policies, actions, and targets.
- **Sustainable Alternatives:** Strive to offer sustainable alternatives to existing products and services and prioritise low environmentally and socially impactful products and services where possible.
- **Open Communication:** Communicate openly with the Company regarding your ESG journey and collaborate with us on improving the sustainability of our products, services, and supply chain. This can be through training or networking events, for example.
- **Continuous Improvement:** Commit to continuous improvement of business practices regarding sustainability, including staying up to date with legal and best practices requirements and developing company awareness on sustainability.

Process for Monitoring and Enforcement of the Policy

The Company's Responsible Sourcing Policy will be communicated to suppliers/subcontractors during the onboarding process, and we will ensure that suppliers/subcontractors are continuously made aware of its existence and contents throughout our work together.

The policy will be reviewed and updated periodically to ensure its continued relevance and alignment with best practice international standards for responsible sourcing. Should any changes occur to our business activities, stakeholder expectations, or industry standards, we will update the policy to reflect them.

We expect employees and suppliers/subcontractors to report any violations of this policy's commitments through our reporting portal at reporting@McKeon.ie.

Oversight of Responsible Sourcing Policy

The Directors of the Company are fully committed to the principles outlined in this policy. We are committed to engaging with our suppliers and subcontractors to promote sustainable procurement and compliance across all our operations.



Policy Governance
Owner: Matthew Banville, Company Procurement Manager.
Approved by: [Board / Executive Committee]
Effective Date: 15/06/2026
Signed By: Matthew Banville

Matthew Banville