

ENVIRONMENTAL, SOCIAL & GOVERNANCE (ESG) POLICY STATEMENT

Introduction:

About Us: The J. Coffey Group is an organisation operating in the Construction & Infrastructure sectors, specializing in sub & superstructure works, design & build, data center development, both in the UK & Northern Europe. We operate with four UKAS recognised International Standards for ISO 9001:2015, ISO 14001:2015, ISO 45001:2018, ISO 50001:2018 along with FSC® Chain of Custody. In 2020 the organisation made a commitment to Pledge to Net Zero by 2034 in line with the Greenhouse Gas Protocol.

ESG Governance: Our Corporate Sustainability Committee oversees our policies and operational controls for environmental, health & safety and social risks, and is led by the Group Managing Director.

ESG Commitment: We strive to build sustainable, equitable, healthy, and diverse communities through a combination of innovative construction practice and exemplary environmental, social and governance (ESG) performance. This commitment informs every aspect of our business, including how we design and build new projects, operate our portfolio, collaborate with stakeholders and report progress.

1. Environmental Stewardship:

1.1. Overview: We aim to embed environmental stewardship in everything we do. We believe we have a responsibility to minimise the energy, carbon, water and waste impacts of our business and recognise that these impacts occur not just in the daily operations of our portfolio but also through our entire value chain. As a result, we strive to reduce environmental impacts across our corporate operations.

1.2. Statement on Climate Change: We are committed to driving down our energy and carbon impacts, as we believe that climate change is one of the greatest risks to our world and know that buildings contribute 40% of global greenhouse gas (GHG) emissions. Our culture of sustainability is committed to environmentally sustainable initiatives that deliver value and health for our business, staff and community in which we operate. We have committed to a fifteen-year objective to achieve Net Zero based on Science Based Target initiatives which exclude carbon offsetting in line with the Greenhouse Gas Protocol. The organisation maintains a Climate Change Risk Register, that reviews the potential impact of Climate Change weather events and the impact they can have on the organisation, and the necessary mitigation measures to adopt in such circumstances.

1.3. Industry Engagement: We also strive to engage key industry players—including vendors, peers, and standard-setters on sustainability, as averting a climate crisis and other environmental disasters requires large-scale transformation that we cannot achieve alone. We are active participants with industry associations/organisations, including:

- ISEP (Institute of Sustainability & Environmental Professionals)
- Supply Chain Sustainability School
- Planet Mark
- GLAA (Gang-masters Labour Abuse Authority)
- SEDEX

2. Social Responsibility:

2.1. Overview: A deep commitment to social responsibility is core to who we are as an organisation. We believe people are at the heart of our business and take pride in our outstanding work culture. We strive to be an optimal employer to our workforce as well as a valued partner to our clients and the communities we provide project delivery, where we have appointed **Planet Mark** to validate our social value in accordance too the Government recognised TOMS metrics.

2.2. Benefits: We know that the first step in hiring and retaining the best talent is to create safe and inspiring workplaces where people feel valued. We offer benefits to all regular full-time employees. In 2023, we launched our new benefit platform to provide our staff with a range of discounts, helping their pay packets go further and increasing their overall financial wellbeing. As we look forward, we hope to continuously improve the workplace experience. We continue providing new employee support in accordance with our volunteering policy, giving employees the opportunity to take part in charitable volunteering, helping communities, growing their knowledge and skills and helping the organisations positive impact on the community.

2.3. Culture, Engagement and Growth: We create fun, spirited work environments that reward innovation and collaboration at all levels which every new employee is given. Leaders are encouraged to demonstrate an “open door policy” and employees can provide feedback through their annual performance reviews. We hold periodic employee appreciation events, such as our charitable annual golf day. We also aim to foster both personal and professional growth for employees at all levels of the organization through annual performance reviews, role-specific training and professional development opportunities through the Chartered Institute of Building (CIOB) and RICS, CIPD, ACCA and ICE.

2.4. Health and Safety: The health and safety of our employees, tenants, and vendors is of the utmost importance to us. We adhere to leading health and safety standards across our portfolio, and each year, we conduct various health seminars and require all our employees to complete safety training.

2.5. Diversity and Inclusion: We embrace and value diversity in all its forms, whether gender, age, ethnicity or cultural background. Equal opportunity is integral to our recruitment process, as we aim to develop a community of diverse talents. We seek to maintain a positive workplace, free from discrimination and harassment. We champion pay equity and mutual respect, promoting an environment of fairness and equality. Our commitment to diversity and inclusion applies to the highest levels of the organization.

2.6. Strengthening our Communities: We have a long history of providing meaningful, and often transformational, support to the communities in which we operate. We also provide charitable support to key industry and professional organizations, often in the form of event sponsorships.

3. Governance:

3.1. Overview: We view good governance as essential to creating and preserving value for our shareholders and other stakeholders. This includes a sound approach to corporate governance that complies with all applicable laws, rules, regulations and policies as well as unwavering adherence to our values.

3.2. Holding Ourselves Accountable

3.2.1. Corporate Governance: We have an effective and highly skilled Board of Directors who promote board independence and embrace board diversity in all its facets, including skills, experience, ethnicity and race. Our *Corporate Governance Guidelines* outline key principles and rules to help our Board of Directors exercise its responsibilities and serve the interests of the company and its stockholders.

3.2.2. Transparency: We believe in holding ourselves publicly accountable to our ESG commitments. We will publish information about our ESG performance on a regular basis via our website, in an annual *ESG Report*.

3.3. Doing what's Right

3.3.1. Ethics: Our directors and all employees, including senior management, conduct themselves in accordance with the highest moral and ethical standards, informed by a robust *Code of Business Conduct and Ethics*. We are committed to ensuring a fair workplace for our employees as well as partners with whom we do business. We have strict policies to protect against unlawful discrimination and harassment. We have an Open-Door Policy to encourage honest and direct communication to resolve issues and concerns in an expeditious manner. We are registered members with IHasco, where senior management and staff can access training on correctly managing incidents such as: Anti Bribery, Fraud Prevention, Whistle Blowing, Modern Day Slavery, Sexual Harassment etc.

3.3.2. Human Rights: Our *Human Rights Policy* reflects our longstanding dedication to the preservation of basic rights and human dignity in our workplace and beyond. J. Coffey Group holds human rights to be an essential component of our business. We support internationally recognized human rights principles that promote and protect human rights and align with the UN Sustainability Goals. The policy applies to our operations and affiliates in all assets we own and operate as in line with the new Human Rights Policy 2026.

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

Signed: *Eddie Barrett* (Original Signed)

Date: 25/02/2026

Eddie Barrett

Group Managing Director

On behalf of J. Coffey Construction