



# Supply Chain Code of Conduct

Creating Places for Future Generations

## Introduction

At Sisk\*, we are committed to maintaining the highest standards of integrity, responsibility, and professionalism across our global supply chain.

This Supply Chain Code of Conduct outlines the principles and expectations that govern our relationships with all supply chain partners. It serves as a foundational framework to ensure that every transaction and collaboration reflects our unwavering commitment to ethical business practices, legal compliance, and respect for human rights.

This Code applies to all parties engaged in business with Sisk, regardless of geography or function, and is strictly aligned with local laws, international regulations and globally recognised standards. By adhering to this Code, our partners affirm their dedication to operating responsibly, transparently, and in a manner that supports sustainable and inclusive growth across the entire value chain.

\*It includes John Sisk & Son (Holdings) Limited; John Sisk & Son (Europe) Limited; John Sisk & Son BV; John Sisk & Son (Sweden) AB; JSS Rail Limited; Fuse Rail Limited; John Sisk & Son Limited; Sisk Lagan Joint Venture; John Sisk & Son APS; John Sisk & Son GmbH (Germany); John Sisk & Son (Belgium) BV; John Sisk & Son Oy; John Sisk & Son GmbH (Switzerland)



# Our Values

## Care

- we take care of ourselves, the people we work with, the environment and the community in which we work

## Integrity

- we are honourable in the way we conduct ourselves and our business

## Excellence

- we are the best at what we do

## Message from the Chief Commercial Officer

At Sisk, our supply chain is central to delivering the high standards of safety, quality, sustainability, and integrity that define our work across all countries in which we operate. As a leading organisation in the construction industry, we understand that the way we operate – and the way our partners operate – has a direct and lasting impact on our people, communities, and the environment.

This Supply Chain Code of Conduct sets out the standards and expectations we have for all supply chain partners working with or on behalf of Sisk.

We believe that responsible sourcing, fair labour practices, health and safety excellence, environmental stewardship and ethical business

practices are not only good for business but essential for long-term success. As we continue to grow and operate in diverse markets, this Code provides a consistent framework that supports compliance with applicable laws, fosters mutual respect, and promotes continuous improvement across our supply chain.

We ask all our supply chain partners to commit to these principles, work with us collaboratively, and raise concerns when standards are not being met. Together, we can build not only exceptional projects but a responsible and resilient supply chain that benefits everyone.

**Thank you for your continued partnership.**



**Marcus Carne**  
Chief Commercial  
Officer

*M. Carne*

# Environmental

At Sisk environmental responsibility is core to our business as we seek to minimise impacts from across our operations. We are focused on accelerating climate solutions and leading the way forward in sustainable construction.

## This means that our supply chain partners:

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### ENVIRONMENTAL LAWS AND REGULATIONS

- Comply with all applicable local, national and international environmental laws, standards and permits.
- Remain updated and informed on changes to environmental legislation and proactively update their practices to remain compliant.

### EMISSIONS REDUCTION

- Are expected to actively participate in Sisk efforts to combat climate change by reducing their carbon footprint and adapting innovative sustainable options across their operations.
- Must implement best practices for conserving energy including upgrading to energy efficient equipment.
- Are encouraged to use low carbon fuels such as HVO to reduce their scope 1 emissions.

### WASTE AND SUSTAINABLE RESOURCE USE

- Should demonstrate leadership in waste minimisation and segregation. Packaging is to be optimised prior to delivery and disposed of in the most environmentally friendly manner.
- Are required to demonstrate responsible sourcing of materials to reduce their impacts on natural resources.
- Are encouraged to maximise use of recycled products or products which contain high percentage of recycled materials.



# Labour and Human Rights

Sisk recognises and upholds the principles set out in the United Nations Guiding Principles on Business and Human Rights (UNGP) and the International Labour Organization (ILO) Conventions. We are committed to embedding these standards throughout our operations and supply chain to ensure that human rights are respected, protected, and promoted at every level of our business.

## **This means that our supply chain partners:**

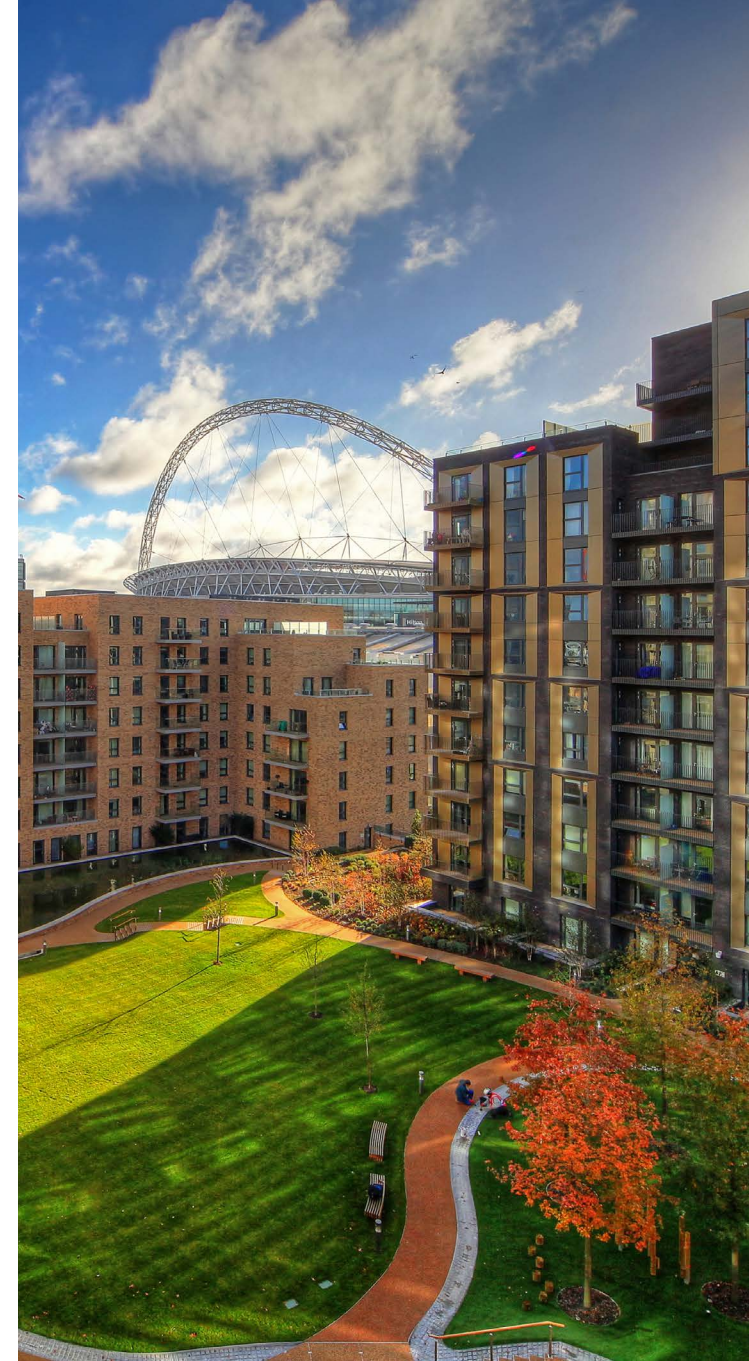
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### LABOUR RIGHTS AND NO CHILD LABOUR

- Comply with all laws and regulations including the International Labour Organisation (ILO) Minimum Age Convention (No. 138) and the Worst Forms of Child Labour Convention (No. 182).
- Ensure any forms of forced, child, bonded, or any forms of involuntary labour within their operations and supply chain, is prohibited.

### ANTI-HUMAN TRAFFICKING AND MODERN SLAVERY

- Respect and uphold the fundamental rights of workers, ensuring that employment is freely chosen and that individuals are never subjected to coercion, exploitation, or abuse
- Act ethically and with integrity in all business relationships
- Implement and enforce effective systems, and controls, to ensure slavery and human trafficking malpractices do not occur within Sisk operations.



# Respect and Diversity

Sisk embraces diversity, creates an inclusive culture and is committed to changing and fostering growth in this space. Sisk perceives bullying, harassment and victimisation of any individual as contradictory to our aspirations for a supportive working environment and will not be tolerated.

## **This means that our supply chain partners:**

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### **EQUALITY, DIVERSITY, INCLUSION AND BELONGING**

- Must promote equality, diversity, inclusion and belonging in recruitment, leadership, and workplace practices, ensuring equal opportunities for all. We ask that our supply chain partners celebrate diversity and people from a range of cultures and backgrounds.
- Ensure that no individual is discriminated on the grounds of any protected characteristics. This includes, but not exclusively, discrimination because of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, sex, religion or belief, sexual orientation or being a member of the traveller community.

### **ANTI-BULLYING, ANTI-HARASSMENT**

- Have a responsibility to treat their workforce with dignity and respect whilst at work
- Must provide a workplace that is free of human rights abuses, including sexual harassment, sexual abuse, corporal punishment, excessive force, mental or physical coercion, and verbal abuse, or threats of such actions



# Business Conduct and Ethics

Sisk ensures that our business operates in full compliance with all applicable local, and national laws and regulations in the countries where we conduct business. Sisk adheres to internationally recognised standards of responsible business conduct and ethics.

## **This means that our supply chain partners:**

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### ANTI BRIBERY AND CORRUPTION

- Must comply at all times with the Sisk Anti-Bribery and Corruption Policy;
- Must comply with all applicable Anti-Bribery and Anti-Corruption Laws
- Will ensure that all relevant employees in your organisation and third parties working with Sisk understand Sisk's zero tolerance approach to bribery and corruption;
- Will ensure that employees of your organisation and third parties as part of your supply chain must not offer or accept gifts or hospitality that could improperly influence decisions or provide unfair advantage

### COUNTER FRAUD

- Must comply with all applicable counter fraud legislation
- Will ensure that all relevant employees within your organisation and third parties who act on our behalf understand and support Sisk's zero tolerance to fraud and fraudulent activities.
- Will ensure that each relevant employee within your organisation and all third parties who act on our behalf understand that it is important for them to consider where, in their own business unit or area, there may be heightened risks of fraud.

- Any fraudulent behaviour shall be treated seriously, and consequences may include employment warnings or possible termination of employment or contracts. We may also report any fraud to the police or an appropriate regulator/agency; there can be serious criminal consequences for individuals involved.
- We encourage and empower any individual who suspects any fraudulent practices to make a report in confidence, through any one of the whistleblowing channels described within the Speak Up Policy document

# Business Conduct and Ethics

## SPEAK UP/ WHISTLEBLOWING

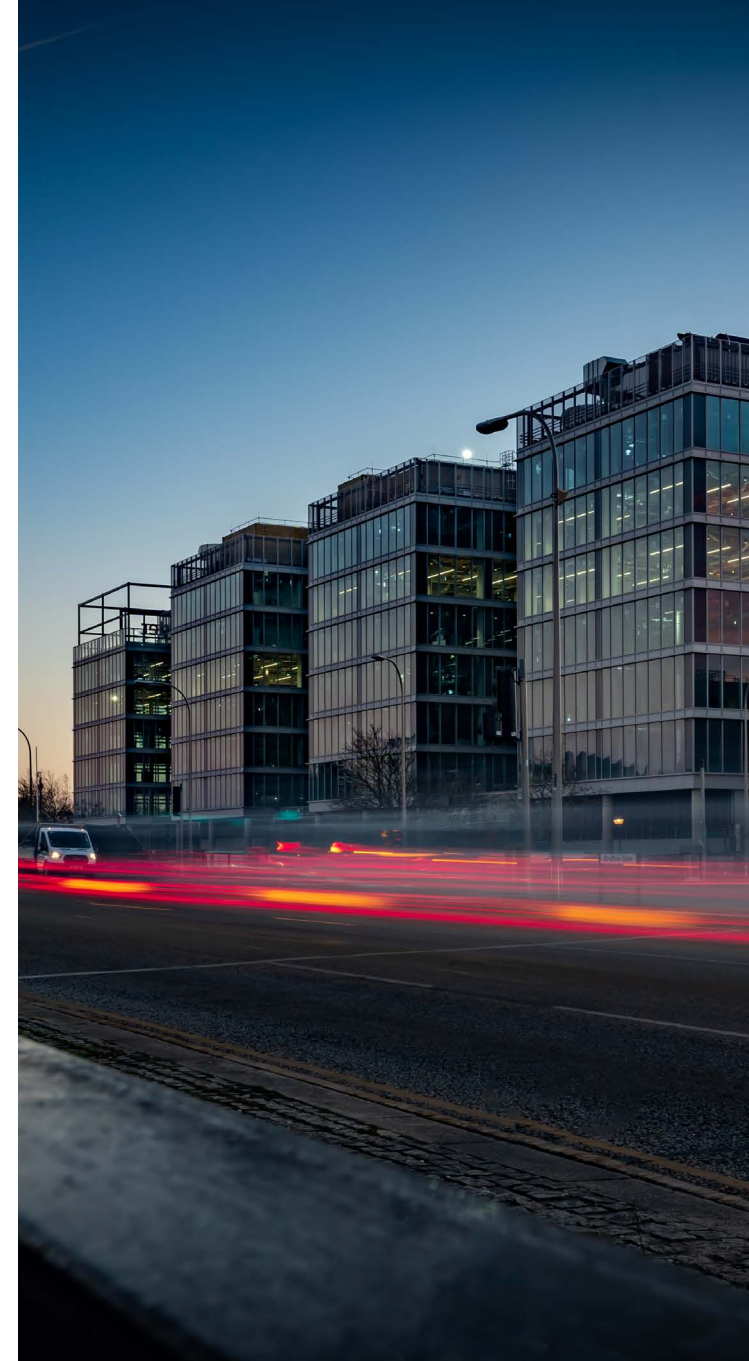
- Must ensure that all workers and stakeholders have access to secure, confidential, and non-retaliatory whistleblowing channels, and that all concerns raised in good faith are investigated impartially and addressed appropriately
- Ensure accessible, confidential, and independent reporting channels
- Guarantee non-retaliation towards whistleblowers and cooperating individuals
- Conduct impartial investigations into concerns and resolve them promptly
- Protect the identity of whistleblowers and adhere to applicable privacy laws
- Regularly review and enhance systems as part of comprehensive due diligence practices
- Comply with all relevant laws and regulations applicable

## FAIR COMPETITION

- Conduct business in accordance with pertinent anti-trust and fair competition laws, fair business practices, and always comply with the Sisk Conflict of Interest Policy.

## DATA PRIVACY

- Protect all personal and confidential data they collect or process, ensuring it is used responsibly, kept secure, and managed in line with international privacy principles and user rights in line with applicable privacy laws, including the GDPR, and cross-border transfer standards



# Business Conduct and Ethics

## CORPORATE CRIMINAL OFFENCE

- Must comply with all applicable laws relating to the prevention of tax evasion and the facilitation of tax evasion
- Not engage in, or support, any activity that could constitute tax evasion or the facilitation of tax evasion
- Maintain and regularly review risk assessments to identify and mitigate exposure to tax evasion facilitation risks
- Implement and uphold robust policies, procedures, and controls designed to prevent the facilitation of tax evasion by employees, subcontractors, and associated persons
- Must ensure all relevant personnel are aware of and adhere to these policies, including providing appropriate training and oversight
- Must promptly report any suspected breaches or concerns relating to tax evasion or its facilitation and cooperate with any related investigations

## ANONYMOUS REPORTING

We understand that there may be times when you do not feel comfortable raising an issue internally or wish to report a concern anonymously. In these situations, you have two options; complete this [form](#) or, report through our secure website [SiskEthicsPoint](#).



## Supply Chain Expectations

Supply chain partners must operate responsibly across environmental, social and governance areas. They are expected to minimise their environmental impact striving for sustainable sourcing and continuous improvement in environmental performance. Supply chain partners must uphold human rights, ensuring operations are free from forced or child labour, and provide safe, respectful workplaces. They should also promote equality, diversity, inclusion and belonging, prohibit discrimination and support fair treatment and accessibility for all workers. Finally, our supply chain partners are required to operate ethically and legally, complying with all relevant laws, including anti-bribery, counter fraud, data protection and speak-up/whistleblowing requirements.

