

Modern Slavery Act 2015 | CL(HT) Act 2008 (as amended)

Modern Slavery Statement

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Signed by:
James Conroy, Director

Purpose

This statement is published in accordance with the Modern Slavery Act 2015 (UK) and reflects Conroy's commitment to ensuring that modern slavery and human trafficking have no place in our business or supply chains. It also reflects our obligations under the Criminal Law (Human Trafficking) Act 2008, as amended (Ireland). This statement sets out the steps Conroy has taken, and continues to take, to ensure that modern slavery and human trafficking are not occurring within our organisation or in any of our supply chains.

Policy Statement

Conroy is committed to conducting business ethically, with integrity, and in full compliance with all applicable laws relating to modern slavery and human trafficking. We operate a zero-tolerance approach to any form of modern slavery, including servitude, forced or compulsory labour, and human trafficking. We expect the same standards from all of our sub-contractors, suppliers, and business partners.

Modern slavery is a crime and a gross violation of fundamental human rights. It takes various forms, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Conroy takes its legal responsibilities in this regard seriously and recognises that failure to comply may result in criminal prosecution, unlimited fines, exclusion from public procurement, and reputational damage.

Our Business

Conroy is a construction management and contracting business operating across Ireland, the UK, and Europe. We deliver complex construction across six sectors: Industrial & Logistics, Advanced Manufacturing, Pharmaceutical & Life Sciences, Critical Environments, Commercial, and Interiors. Our supply chains include sub-contractors providing specialist trade packages, material suppliers, plant and equipment providers, and professional service providers.

Due Diligence

As part of our commitment to identifying and mitigating the risk of modern slavery, Conroy undertakes the following due diligence measures:

- All sub-contractors and suppliers are required to complete Conroy's HSEQ Pre-Qualification Questionnaire, which includes specific questions on modern slavery policies and compliance.

- Sub-contractors and suppliers are required to confirm that they carry out right-to-work checks on all employees and any sub-sub-contractors they appoint.
- All supply chain partners are required to sign Conroy's Supply Chain Code of Conduct, which includes explicit obligations relating to modern slavery, forced labour, and human trafficking.
- We build long-standing relationships with local and national supply chain partners and make our expectations of ethical business conduct clear from the outset of every engagement.
- Where we identify concerns or non-compliance, we reserve the right to terminate the business relationship immediately.

Employee Responsibilities

All employees, officers, and directors of Conroy are required to read, understand, and comply with this statement. The prevention, detection, and reporting of modern slavery in any part of our business or supply chains is the responsibility of everyone working for or on behalf of Conroy. Employees must notify their line manager or a Director immediately if they believe or suspect that a breach of this policy has occurred or may occur.

Employees are encouraged to raise concerns at the earliest possible stage. Conroy will ensure that no employee will suffer any detrimental treatment as a result of raising a genuine concern in good faith relating to modern slavery.

Reporting Concerns

If you have a concern regarding modern slavery or human trafficking within our business or supply chains, you should raise it through one of the following channels:

- Directly with your line manager or a Director of Conroy.
- By email to info@conroy.ie.
- By contacting the Modern Slavery Helpline on 0800 121 700 (UK) or the Garda National Protective Services Bureau (Ireland) via your local Garda station or the confidential line 1800 666 111.

Training & Communication

All employees are informed of this statement during their induction. Our zero-tolerance approach to modern slavery is communicated to all sub-contractors, suppliers, and business partners at the commencement of every business relationship. This statement is available on the Conroy website and is reviewed annually by the Directors.

Monitoring & Review

The Directors have overall responsibility for ensuring this statement complies with our legal and ethical obligations. This statement is reviewed annually and updated as necessary to reflect changes in legislation, business operations, or supply chain arrangements. Any employee who breaches this policy may face disciplinary action up to and including dismissal. Conroy may terminate its relationship with any organisation or individual found to be in breach of this statement.

This statement has been approved by the Directors of Conroy and constitutes our modern slavery statement for the financial year ending December 2026.