

Supply Chain Standards

Supply Chain Code of Conduct

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Signed by:
James Conroy, Director

Background and Scope

Conroy is committed to ethical sourcing and to minimising negative environmental and human rights impacts across our supply chain. This Code of Conduct defines the minimum standards and expectations that every supply chain partner must meet in order to do business with Conroy. It applies to all suppliers, subcontractors, service providers, consultants, and any other party providing goods or services to Conroy. By accepting a contract or purchase order from Conroy, a supply chain partner acknowledges its acceptance of and intention to comply with this Code.

Health and Safety

Supply chain partners must demonstrate a commitment to maintaining and continually improving a culture of safety across all worksites. This includes adherence to all applicable health and safety legislation in Ireland and the United Kingdom, compliance with Conroy's OH&S; management system, and the achievement of safe working practices at all times. For subcontractors, compliance with Conroy's site rules, induction requirements, and permit-to-work systems is mandatory.

Quality Standards

Supply chain partners are expected to deliver work and materials that meet or exceed the quality requirements specified for each project. All subcontractors must submit site-specific RAMS/SWMS, comply with inspection and test plans, and participate in Conroy's quality assurance processes. Non-conformances must be reported and closed out promptly.

Environmental Responsibility

Supply chain partners are expected to minimise the environmental impacts of their operations. This includes managing waste responsibly, minimising carbon emissions, preventing pollution of water and soil, conserving water, and sourcing materials sustainably. For subcontractors, compliance with Conroy's Environmental Management System and any project-specific environmental requirements is required.

Modern Slavery and Human Rights

Supply chain partners must take action to ensure that all forms of modern slavery, including human trafficking, forced labour, and child labour, do not occur in their own operations or those of their supply chain. Partners should have policies in place consistent with the Criminal Law (Human Trafficking) Act 2008 (Ireland) and the Modern Slavery Act 2015 (UK). All labour must be voluntary, and workers must be provided with accurate information about the terms of their employment in advance. Workers must not be required to surrender personal identification or travel documents as a condition of employment.

Working Conditions and Fair Employment

Employment must be based on legal, fair, and secure contracts. All workers must be paid at least the minimum pay rates and entitlements required by law in the jurisdictions in which they operate. Supply chain partners are expected to uphold ethical employment practices that ensure dignity and security for all workers, including compliance with applicable working time legislation.

Equality, Diversity and Inclusion

Supply chain partners must actively promote equality, diversity, and inclusion in their workforce, ensuring workplaces are free from discrimination, bullying, and harassment. Partners should support diversity, create local employment opportunities, and invest in workforce development through training and apprenticeships.

Ethical Business Conduct

Supply chain partners must conduct business with the highest standards of integrity and transparency. Robust anti-bribery and anti-corruption measures must be in place, with zero tolerance for any form of unethical behaviour, including fraud, bribery, or coercion. Partners must comply with Conroy's Anti-Bribery and Corruption Policy.

Legal and Regulatory Compliance

Supply Chain Standards

Full compliance with all applicable local, national, and international laws and regulations is required at all times. This includes laws related to employment, health and safety, environmental protection, data protection, tax, and corporate governance.

Confidentiality and Data Protection

Supply chain partners must comply with all applicable data privacy and data protection legislation, including the General Data Protection Regulation (GDPR). Partners must have processes in place to secure the confidentiality, integrity, and availability of any confidential information received from Conroy or our clients. Conroy operates in sectors where client confidentiality is critical. Partners must not disclose project-specific information to any third party without prior written consent.

Site Photography and Communications

Supply chain partners must not photograph, film, or otherwise record anything relating to a Conroy project site without express authorisation from the Conroy project team. Images and recordings must not be posted to social media or shared externally without written approval. Partners may not represent themselves to the public or media as speaking on behalf of Conroy.

Insurance and Competence

All supply chain partners must maintain appropriate levels of employer's liability and public liability insurance and provide certificates on request. Subcontractors must demonstrate competence through relevant pre-qualification, accreditation, and evidence of workforce training and certification.

Right to Audit

Conroy reserves the right to monitor supply chain partners for compliance with this Code. Partners agree to co-operate in good faith with any audit, investigation, or review, including providing access to records, personnel, and facilities. Partners must also monitor and evaluate their own supply chain to verify compliance with this Code.

Non-Compliance and Reporting

Non-compliance with the requirements of this Code may lead to corrective action plans and, in serious or repeated cases, may result in termination of contracts or failure to renew contracts. Any suspected violation of this Code should be reported to Conroy's Directors or by emailing info@conroy.ie. All reports are treated confidentially and handled in line with relevant legislation.