Human Rights Policy

Effective from July 2026
Review date June 2027

Respect for human rights is fundamental to the sustainability of MJ Gleeson plc and the communities in which we operate. We are committed to ensuring that our employees, our customers and our sub-contractors are treated with dignity and respect.

MJ Gleeson incorporates the Ten Principles of the UN Global Compact into our strategy, policies and procedures, and establishing a culture of integrity around people and the planet.

This Human Rights Policy is guided by international human rights principles encompassed in the Universal Declaration of Human Rights, the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, and our participation with the United Nations Global Compact, and the United Nations Guiding Principles on Business and Human Rights.

This Policy applies to all Group companies and its employees, however we are committed to working with and encouraging our supply partners to uphold the principles in this Policy and to adopt similar policies within their businesses.

Respect for Human Rights & Employee Rights

All MJ Gleeson Group companies commit to protect fundamental human rights of all employees, including the right to water, and is committed to identify, prevent, and mitigate adverse human rights impacts resulting from or caused by our business activities before or if they occur through human rights due diligence and mitigation processes. We respect employee rights regarding worker representation, freedom of association and collective bargaining.

Community and Stakeholder Engagement

All MJ Gleeson Group companies recognise their impact on the communities in which they operate. We are committed to engaging with stakeholders in those communities to ensure that we are listening to, learning from and taking into account their views as we conduct our business. Where appropriate, we are committed to engaging in dialogue with stakeholders on human rights issues related to our business. We believe that local issues are most appropriately addressed at the local level.

Diversity & Inclusion

We value the diversity of the people with whom we work and the contributions they make. We have a long-standing commitment to equal opportunity and intolerance of discrimination and harassment. We are dedicated to maintaining workplaces that are free from discrimination or harassment based on race, sex, ethnicity, national or social origin, religion, age, disability, sexual orientation, political opinion or any other protected

characteristic. The basis for recruitment, hiring, training, compensation and advancement at the Company is performance, skills and experience and qualifications.

Health, Safety & Wellbeing in the Workplace

All MJ Gleeson Group companies provide a safe and healthy workplace and complies with applicable health, safety and environmental laws, regulations and internal requirements. We are dedicated to maintaining a productive workplace by minimising the risk of accidents, injury and exposure to health risks. We are committed to engaging with our employees to continually improve health and safety in our workplaces, including the identification of hazards and remediation of health and safety issues. We have designated Health and Safety policies set out in its Employee Handbook. We provide regular training to employees in safety critical roles on each of its sites, to address health and safety concerns. We provide trained mental health champions to offer support to all colleagues and provides periodic campaigns, engaging with colleagues in relation to mental health awareness and wellbeing.

Forced Labour and Human Trafficking

MJ Gleeson prohibits the use of all forms of forced labour, including prison labour, indentured labour, bonded labour, military labour, slave labour and any form of human trafficking. The Company complies with its obligations under the Modern Slavery Act 2015 and the Modern Slavery Statement is available to view on the MJ Gleeson plc website.

Child Labour

Our direct operations are limited to the UK, and we adhere to all relevant laws & legislation. We acknowledge that some materials and products used may originate from outside of the UK. Throughout our supply chain, we prohibit the recruitment and employment of young people who are below the minimum school leaving age in any country. The International Labour Organisation (ILO), Convention 138 establishes this age at 15 and must not include any hazardous work before the age of 18. Our Sustainable Procurement Policy clearly states our expectations from our supply chain relating to ethics, social responsibility, and sustainability.

Women's Rights

The UK Equality Act 2010 provides a legal framework for equality across protected characteristics, including sex and gender reassignment. However, we acknowledge that our wider supply chain tiers extend globally, thus beyond the geographical and legal boundary of this Act. We unequivocally support The Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) and expect our supply chain partners to uphold these principles to protect women's rights.

Working Hours, Pay and Benefits

The Company compensates employees competitively relative to the industry and local labour market. We operate in full compliance with applicable wage, work hours, overtime and benefits laws. We are committed to maintain our accreditation as a Real Living Wage employer.

Grievance, Guidance and Reporting for Employees

MJ Gleeson Plc creates workplaces in which open and honest communications among all employees are valued and respected and we are committed to following all applicable labour and employment laws.

Please remember that you do not need to have firm evidence of malpractice before raising a concern. However, we do ask that you explain as fully as you can the information or circumstances that gave rise to your concern. If you have a concern about malpractice, we hope you will feel able to raise it first with your line manager. If you feel unable to raise the matter with your manager, for whatever reason, please raise the matter with a senior manager, or a member of our HR department.

If these channels have been followed and you still have concerns, or if you feel that the matter is so serious that you cannot discuss it with any of the above, then you can send an email to Gleeson's dedicated Whistleblowing reporting mailbox: speakup@mjgleeson.com which will notify the Group Head of Legal and Company Secretary. You can also email the independent Whistleblowing helpline provider: SeeHearSpeakUp report@seehearspeakup.co.uk.

We are committed to ensuring that you will not suffer any detrimental treatment as a result of raising a genuine concern and we take a zero-tolerance approach to the harassment or victimisation of anyone raising a genuine concern.

The Company does not tolerate disrespectful or inappropriate behaviour, unfair treatment or retaliation of any kind. Harassment is unacceptable in the workplace and in any work-related circumstance outside the workplace. These principles apply not only to our employees but also to the suppliers with whom we work.

Training & Awareness

All employees are provided with training and awareness in relation to human rights and the whistleblowing procedures and channels available.

Communication of Policy

This policy is publicly available on our website and is always accessible to all colleagues through internal information systems. Any changes to this policy are communicated to all colleagues through bulletins and other appropriate communication methods.

Review of Policy

This policy will be reviewed

- at least annually and / or;
- where there is a change in operation or scope which may impact this policy
- where there is a breach of this policy
- as a result of any material changes to national or international laws / frameworks

Signed by

Graham Prothero - Chief Executive



Date

08 October 2026

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