

**DOCUMENT TITLE:** Anti-Corruption Policy

**REVISION:** 1.01

**DOCUMENT CONTROL LOG:**

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| <b>Prepared By</b> | Luke Deasy | Managing Director |  | 10/02/2023 | 1.01 |
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**ANTI-CORRUPTION POLICY:**

The Company is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure bribery is prevented. The Company has zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever in the country we operate.

The Company will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. We are bound by the laws of the Irish bribery and anti-corruption law, including the Criminal Justice (Corruption Offences) Act 2018, is the key legislation governing bribery and corruption in Ireland.

The Company recognizes that bribery and corruption are punishable by up to ten years of imprisonment and a fine. If our company is discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine, be excluded from tendering for public contracts, and face serious damage to our reputation. It is with this in mind that we commit to preventing bribery and corruption in our business and take our legal responsibilities seriously.

**APPLICATION:**

This anti-bribery policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with us (including third parties), or any of our subsidiaries or their employees, no matter where they are located (within or outside of the Ireland). The policy also applies to Officers, Trustees, Board, and/or Committee members at any level.

In the context of this policy, third-party refers to any individual or organisation our company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies – this includes their advisors, representatives and officials, politicians, and public parties.

Any arrangements our company makes with a third party are subject to clear contractual terms, including specific provisions that require the third party to comply with minimum.

### WHAT IS NOT ACCEPTABLE:

- Gifts and hospitality.
- Facilitation payments.
- Political contributions.
- Charitable contributions.

### EMPLOYEE RESPONSIBILITIES:

As an employee of the Company, you must ensure that you read, understand, and comply with the information contained within this policy, and with any training or other anti-bribery and corruption information you are given.

All employees and those under our control are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this antibribery policy.

If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify your Manager.

If any employee breaches this policy, they may face disciplinary action and could face dismissal for gross misconduct.

### HOW TO RAISE A CONCERN:

If you suspect that there is an instance of bribery or corrupt activities occurring in relation to the Company, you are encouraged to raise your concerns at as early a stage as possible. If you are uncertain about whether a certain action or behaviour can be considered bribery or corruption, you should speak to your Manager, the Office Manager or a director.

The Company will familiarize all employees with its whistleblowing procedures so employees can vocalize their concerns swiftly and confidentially.

What to do if you are a victim of bribery or corruption:

You must tell your Manger as soon as possible if you are offered a bribe by anyone, if you are asked to make one, if you suspect that you may be bribed or asked to make a bribe soon, or if you have reason to believe that you are a victim of another corrupt activity.

### PROTECTION:

If you refuse to accept or offer a bribe or report a concern relating to potential act(s) of bribery or corruption, the Company understands that you may feel worried about potential repercussions. The Company will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.

The Company will ensure that no one suffers any detrimental treatment because of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.

Detrimental treatment refers to dismissal, disciplinary action, threats, or unfavourable treatment in relation to the concern the individual raised.

If you have reason to believe you have been subjected to unjust treatment because of a concern or refusal to accept a bribe, you should inform your Manager or the Office Manager immediately.

### **TRAINING AND COMMUNICATION:**

The Company will provide training on this policy as part of the induction process for all new employees. Employees will also receive regular, relevant training on how to adhere to this policy, and will be asked annually to formally accept that they will comply with this policy.

The Company's anti-bribery and corruption policy and zero-tolerance attitude will be clearly communicated to all suppliers, contractors, business partners, and any third- parties at the outset of business relations, and as appropriate thereafter.

The Company will provide relevant anti-bribery and corruption training to employees etc. where we feel their knowledge of how to comply with the Criminal Justice (Corruption Offences) Act 2018 needs to be enhanced. As good practice, all businesses should provide their employees with anti-bribery training where there is a potential risk of facing bribery or corruption during work activities.

### **MONITORING AND REVIEWING:**

The Company's Office Manager is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. They will assess its suitability, adequacy, and effectiveness.

Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice.

Any need for improvements will be applied as soon as possible. Employees are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to the compliance manager.

This policy does not form part of an employee's contract of employment and the Company may amend it at any time so to improve its effectiveness at combatting bribery and corruption.



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Luke Deasy  
Managing Director