

**ABOUT THIS CODE**

This document sets out our Code of Ethics and the behaviours we expect from everyone. The underlying principle of this Code is that we will strive to perform our duties in accordance with the highest standards of integrity, loyalty, fairness, and confidentiality and that we will comply with all legal and regulatory requirements.

All associated documents referred to in this guide can be accessed through the Managing Director.

**APPLICATION OF THE CODE**

This Code applies to all Steel Formed Section (SFS) Ltd staff, both permanent and temporary, and all third parties with whom SFS does business. We are committed to working only with third parties whose values and standards are consistent with this Code.

<b>RESPONSIBILITIES</b>	
Directors	To approve the Code and receive reports on any significant breaches.
Managers	To lead by example, ensure compliance with the Code and report all suspected breaches.
All	To carry out our business in a way that is consistent with the Code.
Managing Director	Investigation of reported breaches of the Code.

<b>SUMMARY OF THE REQUIREMENTS OF THE CODE</b>	
<b>Do</b>	<b>Do Not</b>
Always conduct your business with integrity, impartiality and respect.	Offer or receive any inducements or gifts which are or could reasonably be perceived as unethical or illegal.
Prioritise safety and report all safety incidents without delay.	Utilise SFS tools, equipment or resources for non-SFS business activities or purposes.
Ensure that you do not engage in or support an outside activity or Company which is in competition with SFS.	Break any law or regulation or tolerate fraud.
Recognise where there is a potential conflict of interest between your work in SFS and any outside personal interest and deal with it appropriately and inform your manager in writing.	Participate in any decision / transaction where you or to your knowledge someone else has a conflict of interest which has not been disclosed to SFS.
Ensure that you work in compliance with all applicable laws and regulations (including taxation) in the countries in which we operate.	Disclose details of confidential Company information to third parties unless required by law to do so.

Make yourself aware of all relevant SFS policies and procedures.	Discriminate in favour of any third parties.
Notify the Managing Director if you are aware of or suspect unlawful or unethical activity.	Behave in any manner which may damage the reputation of SFS Group.

**VIOLATION OF THE CODE**

Violation of the Code by a staff member is considered an extremely serious matter and anyone found guilty of such violation following a disciplinary hearing will be penalised in such a way as to reflect the seriousness of the offence. Penalisation may include dismissal.

Violation of the Code by a contractor, supplier, casual or agency worker will be reported to the relevant person's employer and may result in the termination of their contract. SFS may take action to recover any losses sustained, which may include the issuing of civil and/or criminal proceedings, and in compliance with the Criminal Law Justice Act 2011 the matter may be reported to An Garda Síochána.

## OUR VALUES

Our values serve to guide us:

**FOR SAFETY**

We are for safety and therefore for the behaviours that ensure the safety of ourselves, our colleagues, our contractors and the public.

**INTEGRITY & RESPECT**

We are committed to fairness within our Company and in our regulatory and business dealings.

**RELIABLE SERVICE**

We are a reliable supplier of construction products and operate to the highest business standards.

**SUSTAINABLE INNOVATION**

We strive to learn, to innovate and to do things better.

**TEAMWORK**

We are loyal to each other and to SFS and we work to protect our combined reputations.

# OUR OBLIGATIONS

## **SAFETY**

Safety is a core value in SFS. In addition to our legal obligations we each have a moral, social and ethical responsibility and obligation to keep ourselves, our colleagues and members of the public free from all harm. When dealing with safety issues it is expected that you will act in an open, honest and transparent manner.

## **CONFIDENTIALITY**

We are required to treat all information obtained through work with SFS as confidential. However, we must comply with relevant legislation, including Data Protection and Freedom of Information legislation, Regulatory Licences and internal ring-fencing arrangements relating to the disclosure of confidential information. We may not, without the specific approval of the Managing Director, release confidential information in respect of any aspect of the SFS activities to any third party (including the news media and social media), other than when required to do so by law. These obligations do not cease when employment in the Company has ended.

We in SFS must not acquire information or business secrets by improper means and confidential information must not be used for personal gain for self or others.

## **ACTING WITH INTEGRITY**

As SFS employees we are expected to act with integrity and honesty at all times. Integrity includes ensuring that:

1. The SFS Group's resources are used for the purpose of SFS Group business and are not used for personal gain, directly or indirectly.
2. Offering or Receipt of gifts, hospitality, preferential treatment or benefits that might reasonably be thought to influence an employee in the performance of his/her duties are avoided.
3. The purchasing of goods/services is in accordance with SFS policies and procedures and
4. Expenses claimed are appropriate to business needs and in accordance with SFS policies and procedures.

## **TREATING OTHERS WITH FAIRNESS AND RESPECT**

At all times, we must be committed to fairness in SFS business dealings and in dealings with each other and with those engaged by SFS to assist in its work. As well as being responsible for our own individual conduct we also have a duty to treat colleagues, customers and suppliers with courtesy and respect and to have due regard for their safety, health and welfare.

We must never discriminate against anyone on the basis of gender, marital status, family status, age, disability, sexual orientation, race, religion, or membership of the traveller community.

It is SFS policy that all employees are recruited and promoted on merit. SFS is committed to **OUR OBLIGATIONS** maintaining a work environment that is free from discrimination or harassment and to providing a safe working environment for all staff.

All suppliers are entitled to fair treatment and should each have a reasonable opportunity to compete successfully for business.

### **CONFLICT OF INTEREST**

All of us have a responsibility to be loyal to SFS and to be fully committed to its regulatory and business activities. In your personal dealings you should avoid any conflict of interest and not engage in or support an outside activity or Company which is in competition with SFS.

You must be alert to the fact that conflicts of interest or potential conflicts of interest can arise due to:

1. An outside employment and/or business interest.
2. Your interest in commercial transaction involving SFS.
3. Family members and relatives doing business or interacting with SFS.

If you think that a conflict may exist, or may be perceived as such, you must disclose this in writing to the Managing Director.

You must promptly take action to eliminate any conflict if requested by SFS to do so.

### **FRAUD, DECEPTION & DISHONESTY**

We will not defraud or deceive anyone or act dishonestly, and we will protect the Company against fraud. We will never knowingly seek to gain any advantage of any kind by acting fraudulently, deceiving people or making false claims, and we won't allow anyone else to do so on our behalf. This includes defrauding or stealing from the Company or any third party, and any kind of misappropriation of property.

### **OUR LEGAL OBLIGATIONS**

SFS employees, contractors and all persons doing business with SFS are expected to comply at all times with the laws of Ireland and any other country in which they may be working. All of us have a responsibility to comply with all statutory and regulatory obligations imposed on SFS by legislation and other statutory authorities.

If you hold a Designated Position of employment under the Ethics and Standards in Public Office legislation you must ensure your compliance with the provisions of that legislation. You may be asked to sign-off that you have read and understood the contents of the Code.

### **ANTI-BRIBERY AND ANTI-CORRUPTION**

As an Employee of SFS you must never offer or accept a bribe and must not participate or facilitate corrupt or illegal activities.

Bribery is defined as the conferring of a financial payment or other advantage, with the intent or expectation that a function will be improperly performed in order to give a party a commercial advantage.

Many countries in which SFS does business have anti-bribery and anti-corruption laws that are intended to prevent companies and/or individuals from gaining an unfair advantage. The Bribery Act 2010 in the United Kingdom is of particular relevance to SFS as we do business in the UK.

### **FINANCIAL INTEGRITY**

Financial control procedures in SFS exist to help protect assets, financial integrity, business information of the Company, and that the Company's financial accounts and reports accurately reflect performance and are not misleading. SFS has appropriate and clearly defined authority and financial procedures which must be complied with.

If in doubt check with the Managing Director.

### **PROCUREMENT**

Purchasing/procurement in SFS is governed by SFS purchasing procedures (which adhere to EU procurement regulations).

You must disclose any actual or potential conflict of interest that may arise in the course of your purchasing responsibilities. If this situation arises you should refrain from any further involvement in the purchasing decision. You must not accept any gifts that could be perceived as a bribe, kickback or bartering from any supplier. If you are offered such an inducement you should immediately bring it to the attention of the Managing Director.

### **GIFTS AND ENTERTAINMENT**

An important element of any successful business arrangement is the ability to effectively engage in key relationships: existing and potential customers, suppliers, government or regulatory officials and other third parties.

There are social interactions which typically arise with such people that are part and parcel of doing business, but there are sensible boundaries to these, which need to be observed to protect SFS from damaging accusations of undue influence or bias. For example, it can be customary at Christmas to send or receive gifts of small value to staff, suppliers or clients that we have been dealing with during the year. This is acceptable provided:

1. The gift is unsolicited, and of low value (such as a modest bottle of wine).
2. Not more than one gift is accepted from a single source each year and
3. Details of all gifts are provided to the Managing Director.

Consideration should be given to donating any such gifts to a charity. It should be noted that it is never acceptable to accept a gift of cash.

Staff and client entertainment is also a typical feature of doing business and is acceptable, provided it is within reasonable boundaries, such as a meal at a modest local restaurant or a ticket to a sporting event at a local venue. Accepting a weekend away, flights or a residential stay in a hotel paid for by a client or gifts of cash or gift vouchers would clearly not be acceptable. If foreign travel is necessary for investigation of or sale of products or services, SFS will pay for the trip. In all cases, details of all gifts or entertainment must be provided to the Managing Director.

These examples are intended to provide guidelines to you in deciding what is and is not acceptable behaviour in dealing with third parties during the course of our work. In many cases, the right answer will be obvious, but if you are in any doubt the Managing Director should be consulted.

In summary, you should not accept gifts, benefits, sponsorship or hospitality of any kind that could be deemed to influence and/or secure favourable treatment from the employee or SFS. Particular care should be exercised when tender processes are being conducted.

### **BUSINESS DEVELOPMENT ACTIVITIES**

SFS believes in a healthy rivalry with our competitors and supports a free, open, competitive marketplace, which gives us the opportunity to succeed. Staff involved in business development should ensure that they are familiar with the relevant laws and customs of the country in which they are doing business and should comply with SFS Code of Business Ethics.

### **SOCIAL MEDIA**

If you are participating in social media communications you must adhere to the highest standards of ethics. A policy has been developed for staff who participate in social media in either a professional or personal capacity.

## CONFIDENTIAL REPORTING MECHANISM

Steel Formed Sections Ltd is dedicated to the highest ethical and professional standards of conduct and complies with all applicable laws and regulations. Steel Formed Sections Ltd employees are expected to share in this responsibility by obeying laws and regulations and following all Company policies and procedures.

In addition, Company employees have a personal obligation to report any activity that appears to violate laws, regulations, policies and procedures.

Whenever possible, employees should report any questions or concerns related to potential violations of laws, regulations, policies and/or procedures to the Managing Director.

### PROTECTION AND SUPPORT

SFS will not tolerate any penalisation of any person who raises a concern in the reasonable belief that it intends to show a wrongdoing. Under the Protected Disclosures Act 2014 SFS is required to have procedures for dealing with any protected disclosures that may be made by its employees and others.

A protected disclosure relates to information about a wrongdoing in the workplace which a staff member reasonably believes has taken place. SFS can ensure that staff can bring their genuine concerns to the attention of the Company in the knowledge that those concerns will be dealt with appropriately and without being penalised for doing so.

Upon receiving a report of an alleged violation, SFS will conduct an investigation in accordance with any related laws, regulations, policies and/or procedures.

You should be assured that concerns raised by you or reports of relevant wrongdoings reported by you internally will be dealt with by SFS. You may choose to make a disclosure to a person outside SFS (such as, for example, to a regulator or other person designated by law to receive a disclosure) and that disclosure may be protected under the Act; however, additional good faith or other requirements may apply under the Act. Therefore, you are advised to take legal advice before making a disclosure to such a person or otherwise outside of the Policy.

Failure to make a report may result in disciplinary action up to and including termination of employment.

Signed

Pat Burns *Pat Burns* Date: *11.12.2020*

Managing Director