



Dominic Lydon (Galway) Ltd

Brownville, Bushypark, Galway

Document No: P08 Anti-Bribery & Corruption Policy

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Revision: 1

Anti-Bribery & Corruption Policy

'DLG maintains a zero-tolerance policy in relation to bribery, corruption, fraud, and any other wrongdoing'

Introduction

At Dominic Lydon Galway Ltd (DLG), we are committed to conducting all business activities with the highest standards of [honesty](#), [loyalty](#), [fairness](#), and [discretion](#), and in compliance with all applicable legal and regulatory requirements.

We recognise that a culture of openness and accountability is essential to prevent improper conduct and to address issues promptly when they occur.

This Policy supports those objectives and outlines the standards expected of all individuals associated with the Company - Applies to:

- All directors, employees, contractors, casual and agency workers ("staff"); and
All third parties conducting business with DLG, including suppliers, agents, and consultants.
- All staff and third parties are expected to comply at all times with the laws of Ireland and any other jurisdiction in which they operate on behalf of DLG.

Key Rules

- Do Not Give Bribes
- Staff and business partners must not make payments, offer gifts, entertainment, or favours where this could:
 - Lead someone to misuse their position or perform their duties improperly; or
 - Induce them to act (or refrain from acting) in a way they would not ordinarily do.
- Do Not Accept Bribes
- Staff must not request, agree to receive, or accept any gifts, entertainment, or favours that could result in them:
 - Misusing their position; or Performing their duties improperly.

Public Officials

Gifts, entertainment, or favours must not be provided to public officials for business purposes, except in strict compliance with this Policy and the applicable regulations governing the public official.

Gifts and Entertainment

To mitigate risks of bribery and corruption, gifts and entertainment may only be offered or accepted when all the following conditions are met:

They foster legitimate business relationships.

They are modest and proportionate, not capable of improperly influencing the recipient or appearing to do so.

They do not breach any laws or rules applicable to the recipient, especially if they are a public official.

Gifts of cash or cash equivalents (e.g., vouchers, prepaid cards) are strictly prohibited.

Value Limits

Entertainment and Hospitality

The maximum limit for entertainment or hospitality (e.g., meals, events, or corporate hospitality) is €1,000 per person per 12-month period, whether given or received.

All invitations to corporate events must be referred to Management, who will determine whether the invitation may be accepted and who should attend on behalf of DLG.

Gifts

The maximum limit for gifts (given or received) is €1,000 per person per 12-month period.

Sponsorship and Charitable Donations

Sponsorships and charitable donations may only be made with prior approval from the CFO, CEO, or COO (Senior Management Team).

Exceeding Value Limits

Any request to exceed the specified limits must be pre-approved by Management, who shall consult with the Senior Management Team before authorisation.

Gift and Hospitality Register

The Finance Team shall maintain a Gift and Hospitality Register to monitor and manage bribery and corruption risks. The Register ensures that All gifts, hospitality, entertainment, or sponsorships are recorded, Activities comply with this Policy and Claims for related expenses cannot be processed until the relevant entries have been verified.

It is the responsibility of Management to ensure the Register remains accurate and up to date.

Reporting a Concern

If you have any concerns regarding gifts, entertainment, or hospitality, you should raise the matter with your Manager or Directors in the first instance.

DLG encourages openness and will support anyone who raises genuine concerns in good faith.

We have a strict non-retaliation policy — harassment or victimisation of anyone making a protected disclosure will not be tolerated. Any evidence that an employee has suffered disadvantage for raising a legitimate concern will be treated seriously and may result in disciplinary action.

Policy Endorsement

This Policy is fully supported by the Senior Management Team and the Directors that applies to all business operations within Dominic Lydon Galway Ltd.

Approved by

Derek Mulveen

Derek Mulveen (General Manager)

06/01/2026