

Code of Ethics

Purpose

The purpose of this Code of Ethics is to set out the principles and standards of conduct expected from all employees, directors, and business partners of the Company.

It serves as a guide to making ethical decisions and maintaining the highest levels of integrity, professionalism, and respect in all business activities.

Scope

This Code applies to: All directors, officers, and employees of the Company;

All contractors, consultants, agents, and suppliers working on behalf of the Company; and

Any third parties representing the Company's interests in any capacity.

Everyone covered by this Code is expected to act in accordance with both the letter and the spirit of its principles.

Core Ethical Principles

Integrity

We act honestly, transparently, and fairly in all our business dealings. We do not tolerate bribery, corruption, fraud, or deception of any kind.

Accountability

We take responsibility for our actions, decisions, and their consequences, and we hold ourselves to the highest standards of ethical conduct.

Respect

We treat all people with dignity, fairness, and courtesy, valuing diversity, equality, and inclusion.

Compliance

We comply with all applicable laws, regulations, and internal policies in every country where we operate.

Transparency

We communicate openly and honestly with stakeholders and ensure that our actions are consistent with our commitments.

Sustainability

We are committed to protecting the environment, supporting human rights, and contributing to the long-term wellbeing of our communities and stakeholders.

Ethical Conduct in Practice:

Compliance with Laws

All staff must comply with all applicable national and international laws, including those relating to health and safety, the environment, employment, data protection, and anti-corruption.

Conflicts of Interest

Employees must avoid situations where personal interests conflict, or could appear to conflict, with the interests of the Company. Any potential conflict must be disclosed to Management immediately.

Anti-Bribery and Corruption

As set out on our Anti-Bribery & Corruption Policy

The Company has zero tolerance for bribery or corruption in any form. No employee or representative shall offer, give, request, or accept any improper advantage, payment, gift, or favour.

Fair Competition

We believe in competing fairly and lawfully. We will not engage in anti-competitive behaviour such as collusion, price fixing, or abuse of market position.

Confidentiality and Data Protection

Employees must protect confidential information and use it only for legitimate business purposes. Personal and company data must be handled responsibly and in compliance with data protection laws.

Health, Safety, and Environment

We are committed to providing a safe, healthy, and sustainable workplace and to minimizing environmental impact through responsible operations.

Respect in the Workplace

Harassment, bullying, discrimination, or any form of inappropriate behaviour will not be tolerated. We are committed to maintaining a workplace culture based on respect and inclusion.

Human Rights

We respect and promote internationally recognised human rights, as outlined in the Universal Declaration of Human Rights (UDHR) and the International Labour Organisation (ILO) Core Conventions.

Speaking Up and Non-Retaliation

Employees and business partners are encouraged to report any unethical, illegal, or unsafe conduct as per our Non-Retaliation Policy. The Company's Non-Retaliation Policy ensures that anyone who raises concerns in good faith is protected from retaliation or disadvantage.

Concerns can be reported to a Manager, Human Resources, or through an approved whistleblowing channel.

Leadership Responsibilities

Leaders and managers are expected to Demonstrate ethical behaviour through their actions, promote a culture of openness, respect, and integrity, Support employees in understanding and following this Code addressing any ethical or compliance concerns promptly and fairly.

Fair Treatment of Suppliers

We are committed to treating all suppliers fairly, transparently, and ethically. Procurement decisions are based on objective criteria such as quality, cost, reliability, and sustainability performance. We expect our suppliers to adhere to high ethical standards and to comply with applicable laws, including anti-bribery, anti-slavery, and human rights requirements.

Anti-Trafficking and Slavery

Dominic Lydon (Galway) Ltd. has a zero-tolerance policy for modern slavery, human trafficking, and forced labour in any part of our operations or supply chains. We are committed to continuous improvement in preventing these practices, including through supplier audits, risk assessments, and employee awareness programs.

Confidential Reporting and Anti-Corruption Resolution

A confidential mechanism has been established to report, investigate, and resolve any instances of bribery or corruption. Reports can be submitted to a Manager, Human Resources, or via approved whistleblowing channels. All reports will be treated seriously, investigated promptly, and resolved fairly, ensuring protection for individuals raising concerns in good faith.

Consequences of Misconduct

Violations of this Code may result in disciplinary action, up to and including termination of employment or contract. In some cases, breaches may also lead to civil or criminal liability.

Continuous Improvement

The Company will periodically review and update this Code to ensure its relevance and effectiveness, and to reflect evolving best practices and regulatory requirements.

Policy Endorsement

This Code of Ethics is fully endorsed by the Senior Management Team and forms the foundation of the Company's ethical and responsible business practices.

Human Rights Irish Government, United Nations & The International Labour Organisation:

<https://www.ireland.ie/en/dfa/role-policies/international-priorities/human-rights/human-rights-in-ireland/>

https://www.un.org/en/global-issues/human-rights?gad_source=1&gad_campaignid=20126487822&gbraid=0AAAAAD9kiAdliwEKIt0WYkA2gUC0upybC&gclid=CjwKCAjwgeLHBhBuEiwAL5gNEd8uQVzWNmHP-A5g5NQOgloDmXjwkrikOtE6jqbzVOnDvGybyimBFBoCaTAQAvD_BwE

https://unfoundation.org/blog/post/the-universal-declaration-of-human-rights-is-turning-75-heres-what-you-need-to-know/?gad_source=1&gad_campaignid=19554869486&gbraid=0AAAAAD9kiAf9_rzqk9abIBzYrNg33K3hn&gclid=CjwKCAjwgeLHBhBuEiwAL5gNEQoeErQdipgVYPrY2zL3P16wEQA0HxypwAsKbYhy65sm0oPFiFcNExoCtZQQAvD_BwE

<https://www.ilo.org/>

<https://www.citizensinformation.ie/en/employment/employment-rights-and-conditions/employment-rights-and-duties/employment-laws-in-ireland/>

Approved by

Derek Mulveen

Derek Mulveen (General Manager)

06/01/2026