

Employee Code of Conduct

Approved by the Board of Directors 28th March 2025

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Introduction:

The Code of Conduct for employees has been revised to ensure that the employees of Shannon Foynes Port Company are in full compliance with the Code of Practice for the Governance of State Bodies under the aegis of the Department for Transport This Code of Conduct applies to the employees of Shannon Foynes Port Company and of its subsidiary companies. Note: References in this document to Shannon Foynes Port Company should be construed as including all subsidiary companies

General Policy

It is an objective of the Shannon Foynes Port Company and its subsidiaries to establish a high reputation for ethical behaviour and fair dealing in the conduct of its business. In many cases decisions as to what is ethical or fair are clear cut and will be obvious to any reasonable person. In some situations, however, there may be circumstances where an element of doubt or ambiguity arises. To help in those circumstances and to protect and guide individual employees of the Shannon Foynes Port Company, it is necessary to have a written code of ethics.

It would not be practicable to legislate in sufficient detail to cover every eventuality involving a conflict of interest or other ethical issue. Accordingly, Employees should be aware that the spirit as well as the precise wording of this Code should be observed at all times. If there is doubt about the probity of any particular situation, the employee's immediate supervisor must be consulted about that situation by the individual concerned. If there is still doubt, the employee's manager should be consulted.

Clarification of any part of the document will be given, if required, by Heads of Departments. Breaches of the Code will constitute a breach of discipline and will be dealt with in accordance with our disciplinary procedure which may result in disciplinary action, up to and including termination of employment.

The SFPC Employee Code of Conduct must be read in conjunction with the SFPC Employee Handbook which includes comprehensive details relevant to company policies and procedures.

Purpose of the Code of Business Conduct

The purpose of the Code of Business Conduct is to offer guidance to Shannon Foynes Port Company employees in their business conduct. The Code of Business Conduct applies to all the employees of the Port Company and its subsidiaries and it is intended to:

- Assist the employees of Shannon Foynes Port Company in the performance of their duties, in accordance with best practices
- Establish an agreed set of ethical principles.
- Promote and maintain confidence and trust and prevent the development or acceptance of unethical practices.
- Ensure that the Shannon Foynes Port Company employs the highest ethical standards in all its activities and prevent the development or acceptance of unethical practices.

Employees who are engaged in the purchasing of goods or services, the placement of contracts or the approval of payments to or by the group must have particular regard to the terms of the Code.

Principles of the Code of Business Conduct:

The guiding principles of the Code of Business Conduct Ethics can be summarised under the following headings:

- Integrity
- Information
- Obligations
- Loyalty
- Fairness
- Work/external Environment
- Disclosure of Interests
- Gifts
- Hospitality

Integrity

Each employee of Shannon Foynes Port Company is expected to observe the highest standards of honesty and integrity in all his/her business dealings.

To this end, employees are required to:

- Avoid the giving or receiving of bribes, gifts or hospitality which may affect their ability to make independent judgement on future business transactions, and report any such approaches in writing to one's superior
- Be committed to competing vigorously and energetically for the Company but also ethically and honestly and to reject any business practice which might reasonably be deemed to be improper
- Conduct their purchasing activities in accordance with best practice and the Company's purchasing procedures.
- Ensure that engagements of consultancy and other services is in compliance with public policy guidelines.
- Be committed to ensuring that its accounts and reports accurately reflect its business performance and are not designed to be misleading.
- Be committed not to acquire information or business secrets by improper means.
- Avoid misrepresenting one's position or being ambiguously misleading
- Disclose outside employment/business interests that may be in conflict or have potential to cause conflict with the operation of the Company.
- Not abuse one's position in the Company for personal gain

Information & Confidentiality

The need for observing confidentiality with regard to company affairs is paramount. Every employee in the Shannon Foynes Port Company owes a duty of confidentiality to the Company. The unauthorised release of confidential or strictly confidential information directly or indirectly to third parties, including the media, represents a gross breach of trust which can be highly damaging to Shannon Foynes Port Company and is strictly prohibited.

Employees are required to ensure that business information which they obtain by reason of their employment is not misused, whether by suppliers, their competitors or competitors of the Company. In order to protect such information, employees are required to:

- Provide access to general information relating to the Company's activities in a way that is open and that enhances its accountability to the general public.
- Ensure that such information is properly safeguarded and avoid using such information for personal gain
- Exercise due care in communicating such information, where the Company is releasing sensitive information into the public domain, it is required to observe appropriate prior consultation procedures with the third parties involved
- Never compromise the reputation of the company in any way through inappropriate online interactions, in particular, through the use of social media channels inclusive of company approved or personal accounts. In this regard employees must not do anything that could prejudice the reputation of the company when engaging in online activity, never discuss or disclose confidential or non-public information relating to the organisation either on public media or any online media channels, never publish information on any social media site where such use has the potential to negatively affect the organisation. Additional information relating to the use of company approved social media accounts and potential representation on personal social media is outlined in approved policies ref PRO41 & PRO34.

Comply with relevant statutory provisions including Data Protection Legislation.

Obligations

In order to ensure compliance in one's business dealings with the laws of Ireland, employees are required to:

- Comply with the Company's purchasing and tendering procedures and with prescribed levels of authority for sanctioning any relevant expenditure
- Fulfil all regulatory and supervisory obligations imposed on the Shannon Foynes Port Company

- Introduce and comply with the controls in place for the prevention of fraud, including those in relation to the claiming of all business related expenses.
- Co-operate with relevant regulatory and supervisory bodies
- Avoid false, inaccurate or misleading entries in record
- Ensure that taxation and welfare legislation is upheld
- Ensure one's actions comply with relevant contractual obligations
- Encourage effective and fair competition at all times
- Avoid engaging in any illegal or criminal activities

Loyalty

Employees are required to:

- Acknowledge their responsibility to be loyal to Shannon Foynes Port Company and be fully committed to all its activities, while mindful that the Company must at all times take into account the interests of all funders, including tax payers.
- Acknowledge the duty of all to conform to highest standards of business ethics.

Fairness, Diversity, Equity and Inclusion

Employees are required to:

- Comply with the policies, standards, procedures and/or regulations adopted by Shannon Foynes Port Company to include but not limited to employment and equal status legislation when carrying out their roles and responsibilities.
- Be committed to fairness, diversity, equity and inclusion in all their business dealings.
- Treat all customers, employees and other stakeholders equally, regardless of race, gender, religious belief, age, disability, civil status, family status, sexual orientation or membership of minority or ethnic communities.
- Maintain the rights to equal treatment, established by equality legislation, and accommodate diversity, so as to contribute to equality for those groups covered by equality legislation.

Work / External Environment

Employees must at all times:

- Promote the development of a culture of 'speaking up' whereby workers can raise concerns regarding serious wrongdoing in the workplace without fear of reprisal
- Place the highest priority on promoting and preserving the Health, Safety & Welfare of our employees and other port users.
- Ensure community concerns are fully considered in our activities and operations.
- Endeavour to minimise any detrimental impact to the environment through the Company's operations.

Disclosure of Interest

All employees of the Shannon Foynes Port Company will declare, in writing, any potential conflict of interest that might affect their impartiality in carrying out their duties as soon as they become apparent, including:

- Any interest which could benefit or otherwise materially affect another party with which a family relationship exists or from which a financial benefit might accrue to the employee concerned, whether from investments or otherwise.
- Any interest, shareholding or possible conflict of interest an employee has with any firm or organisation from which the Port Company purchases supplies, works or services, or through whom the Port Company proposes to sell property or services
- Any outside employment or business interests in conflict or potentially in conflict with the Shannon Foynes Port Company business
- Acknowledge their responsibility to be loyal to the Company and be fully committed to its business activities. Where a conflict of interest situation could arise for an employee, he/she must desist from dealing with the contract giving rise to that situation, and may not attempt in any way to influence the Company decision on the matter.

Guidelines regarding Gifts or Hospitality

It is customary for many suppliers to offer gifts, hospitality or entertainment to named employees with whom they have contact as a result of business dealings.

Gifts: Employees should not solicit or accept sponsorship or gifts, for the Company, or for events involving SFPC employees, where this could be deemed to influence or otherwise compromise a Company decision relating to any transaction with the donor

Employees may accept gifts from suppliers or contractors who have worked for the Port Company, provided:

- The gift is unsolicited
- The gift is one of very small intrinsic value

In all other cases, the gift should be returned to the sender, with a note advising that acceptance would be contrary to Company policy. Details of returned gifts must be notified at once to the recipient's superior.

Hospitality: Entertainment of employees by suppliers or customers is acceptable within normal criteria. Modest hospitality (including sporting events and golf outings) may be accepted, provided:

- The frequency and scale of hospitality is not more than the Port Company might be expected to give in return
- The number of staff availing of the hospitality is kept to a minimum
- Invitations do not include the provision of travel or overnight accommodation and availing of the hospitality does not identify the Port Company in a public way with any particular supplier or contractor.

These examples are intended as guidelines to help make sensible decisions. Most cases will be obvious. However if doubt still exists you should consult your Department Manager. Department Managers should consult the CEO.

- This Code will be reviewed from time to time to ensure that it continues to be in accordance with current legislation and best practice.