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Ethical Code of Conduct Policy

Statement of Intent

Errigal is committed to ethical business behaviour at all times in every aspect of the management and operation of our business.

As part of this commitment, the Company will not tolerate any action or omission by any employee or any other person or organisation acting on the Company's behalf that could, by any reasonable interpretation, be considered unethical or fraudulent or could be viewed as malpractice, either commercially or morally. An example of such corrupt behaviour would be bribery or the giving and receiving of gifts where these are clearly offered and received in an atmosphere whereby a promise related to business dealings is offered in return for such a gift – but this would not be the only type of behaviour that might be considered as corrupt.

Responsibilities

Our Construction Director and our Financial Director are ultimately responsible for fulfilling this commitment. The Company is also supported by competent external advisors who provide advice, guidance and hands-on assistance with management issues including health, safety, welfare, environment, quality, and employment issues. The external advisors take account of the statutory, i.e., legal, and voluntary regulatory requirements that may be applicable to our business, in the advice, support and documentation they provide and that we produce ourselves.

It is the duty of our Construction Director and our Financial Director with the support of the Management Team to ensure that adequate resources are made available to ensure our statutory obligations are continuously fulfilled and that all management and administration practices, processes, procedures, systems and documentation are designed to remove or minimise the temptation to take 'short-cuts' or to engage in other acts e.g. offering or accepting or soliciting bribery or other corrupt practices that could in any way reflect badly upon our business and our customers.

Arrangements

We will take appropriate steps to ensure that our statutory duties are met at all times e.g., in particular (but not exclusively) with regard to the UK Acts, UK Regulations and relevant EC Directives relating to employment, health, safety and welfare, environmental and accountancy practices.

We consider that this commitment also encompasses our responsibility for protecting other persons and organisations with whom we are associated from any harm that could result from any breach in this policy.

Each employee and person otherwise engaged by our company will be given such information, instructions and training as is necessary to enable their full understanding of and compliance with this policy.

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Adequate facilities and arrangements will be maintained within our employment practices to encourage ‘whistleblowing’ i.e., to encourage employees or their representatives to raise issues such as suspected or identified breaches of this policy.

Competent people, including, where appropriate, specialists from outside the organisation, will be appointed to assist us in meeting our statutory duties and those obligations that we have voluntarily adopted, such as this and other Company policies,

The successful implementation of this policy requires total commitment and co-operation from and between all levels of employee and contracted personnel working for our Company. Each individual has a legal obligation to act within relevant UK and European law and, as such, to act responsibly for his / her own sake and for the sake of his / her colleagues and other people outside the Company with whom we interact.

Performance Management, Monitoring and Review

This policy will be regularly monitored to ensure that the objectives are achieved, and it will be reviewed and, if necessary, revised in the light of legislative or organisational changes.

Authorisation


_____ 05/01/2026


_____ 05/01/2026

Cormac McCloskey & Damien Treanor

Managing Directors (Errigal)