


Document Number	SHEQ-0606	Prepared By	SHEQ Department	
Revision Number	02	Date	05/01/2026	

Corporate Social Responsibility Policy

Statement of Intent

Errigal recognises the importance of exercising corporate social responsibility (CSR). The purpose of this policy is to define Errigal responsibilities with regards to the below.

Responsibilities


The controls for the management of adverse publicity for those employed by Errigal ultimately lies with the board of directors. All employees have a responsibility to comply with this policy and its associated arrangements.

Arrangements

Our definition of CSR is the commitment to and implementation of the collection of requirements (i.e. those that are applicable or relevant to our business) that are set out in the following British or International standards or codes of practice that are not mandatory i.e. whose implementation are not as yet mandatory under UK law:

- ISO 14001, in relation to best practice environmental management, which is in itself covers one major aspect of CSR – compliance with which we are committed to, through our documented environmental management system that is gradually being implemented, with a view to achieving UKAS accredited certification.
- ISO 9001, in relation to best practice general business management, although there are no direct references to CSR in this standard – compliance with which we are committed to, through our documented environmental management system that is gradually being implemented, with a view to achieving UKAS accredited certification.
- OHSAS 18001, in relation to best practice health and safety management – compliance with which we are committed to, through our documented health and safety management system, as set out in our Health and Safety Manual. environmental management system that is gradually being implemented, with a view to achieving UKAS accredited certification.

All of the above voluntary schemes also contain a clearly stated or strongly implied requirement that our business complies with all applicable statutory requirements but they do not clearly specify or recommend which particular, separate, CSR specific scheme or standard, if any, should be adopted and implemented – there being several available, each aimed at different corporate or governmental or national / multi-national group or level of management. There are also certain UK or EU originated statutory / legislative requirements relating to social responsibility or human rights that the company recognises and is fully committed to, so far as they relate to our business or operations. It should be noted that we identify all current, applicable legislation relevant to all aspects of our business, in our Register of Legislation, etc. and

Document Number	SHEQ-0606	Prepared By	SHEQ Department	
Revision Number	02	Date	05/01/2026	


Compliance Check but for the purposes of illustrating our approach solely to CSR, We have identified the most relevant legislation and the most popular CSR specific and / or closely related British and International business ethics standards, in the list below:

- The Companies Act 2007 (UK legislation)
- The Immigration, Asylum and nationality Act 2007
- The Equality Act 2010
- Employment Relations Act 1999
- The Modern Slavery Act 2015 * further information on our approach to meeting the requirements of this Act are given overleaf.
- BS ISO 26000:2010 – Guidance on social responsibility
- BS8900:2007 Guidance for managing sustainable development
- BS ISO/IEC 38500:2008 – Corporate governance of information technology
- BS 25999-1:2007 – Business continuity management – Code of practice
- SA 8000 (a management system tool)
- AA 1000 Stakeholder engagement standard 2011 (AA1000SES)
- Universal declaration of Human Rights
- ILO Declaration on Fundamental Principles and Rights at Work
- Principles contained in the Rio Declaration on Environment and Development
- The “White Paper” on Corporate Government, promoted by OECD and IFC (World Bank) this being a voluntary initiative, which seeks to strengthen and harmonize the diverse aspects and characteristics that identify, a “good corporate governance”

Further, the main or most influential CSR organisations or schemes other than those promoted or initiated by general standards’ bodies such as BSI, ISO, etc. that we have identified are as follows:

- The United Nations (UN) initiative “Global Compact” (this being a strategic policy initiative for businesses that are committed to aligning their operations and strategies with ten universally accepted principles in the areas of human rights, labour, environment and anti-corruption
- World Business Council for Sustainable Development;
- Institute of Social and Ethical Accountability;
- CSR Europe
- The UK based ‘CORE’ (Corporate Responsibility Coalition) – taking its lead primarily from the UK The Companies Act 2007, that emphasises Directors’ responsibilities for CSR

We have not until now made commitment to any of the previously listed voluntary / non-mandatory standards, but through our own internal audit and review processes, we believe we already comply with the applicable requirements within them, based on our commitment to the CORE initiative that is associated with the Companies Act 2007 – Directors’ Duties Guidance’ publication.

Document Number	SHEQ-0606	Prepared By	SHEQ Department	
Revision Number	02	Date	05/01/2026	

Concerning the Modern Slavery Act 2015 our Policy and Annual Slavery and Human Trafficking Statement is as follows:

The company select suppliers and subcontractors that, so far as can be reasonably ascertained, are compliant with all applicable UK and EU legislation relating to employment law, human rights law and who are socially responsible organisations. Purchasers / selectors and users of suppliers / subcontractors are aware of the existence of modern slavery and human trafficking and the need to identify and prosecute the criminals or organisations who criminally undertake these activities, bearing in mind that the people we engage may sometimes be non-UK citizens and as such could, potentially be at risk from trafficking or slavery. Our policy is to do everything within our corporate power to assist the prosecuting authorities in bringing such criminals to justice. Therefore, those of our staff who are involved in the recruitment of, and direct contact with staff and particularly site-based staff, are aware of and do ensure that, particularly, but not only, non-UK citizens, everyone's right to work in the UK is established through documentation checks, records of which are held. The outcome of documentation checks if giving cause for concern is reported to our HR department who will in turn report to top management, who will if considered appropriate in terms of the legal requirements, report the concern and associated evidence to the relevant UK Government(s). If any such alleged criminal activity is directly reported by an individual job applicant or employee to a member of company staff, this would be reported similarly within our organisation as for a concern raised from the outcome of documentation checks.

Our Annual Performance against the above statement: In the 12 months leading to this issue of this CSR Policy, there have been no cases of human trafficking or modern slavery involving workers engaged by our business that we could reasonably be expected to have been aware of.

Thus, the company has determined that the most appropriate commitment for it to make, initially, would be to: (a) recognise and comply with the requirements of the CORE organisation which is based primarily on UK legislation; and (b) recognise and comply with the requirements of BS ISO 26000:2010 as this is both a British and Internationally adopted standard.

In making these commitments the company recognises and will take improvement action where necessary, within its sphere of influence, including where reasonably practicable its supply chain, on the following issues (this is not intended to be an exhaustive list):

Child labour; Forced labour; Fair trade; Health and safety; Unfair discrimination; Freedom of association; Fair pay; Anti-corruption; Environmental impact; Working hours.

The company engages in social and charitable activities within the local and wider / world-wide community, sometimes through activities engaged in by certain employees acting as individuals rather than as company representatives but supported by the company. The specific activities are identified as part of our management review process.

Document Number	SHEQ-0606	Prepared By	SHEQ Department	
Revision Number	02	Date	05/01/2026	

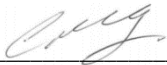
The most significant improvement activities currently undertaken by the company as a corporate entity include those managed through our ISO 14001 environmental management system. In due course we will implement or take part in other, appropriate projects.

Our Financial Director can provide, on request, specific details on the various CSR projects we are engaged in through our environmental management and other improvement programmes.

Performance, 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)