


Document Number	SHEQ-0607	Prepared By	SHEQ Department	
Revision Number	02	Date	05/01/2026	

Business Ethics, Including Bribery, Non-Corruption & Non-Collusion Policy

Statement of Intent

Errigal are committed to ethical business behaviour at all times in every aspect of the management and operation of our business. The primary objective of this policy is to prevent the potential for acts of bribery, corruption, collusion or anti-competitive behaviour and if such action is alleged against any member of the Company's staff or any other party while acting on the Company's behalf, to thoroughly investigate it and should it become necessary as a result, to take appropriate disciplinary action.

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 in connection with ethical company behaviour with particular regard to the requirements of all applicable UK Government legislation i.e. primarily Enterprise Act 2002, the Companies Act 2006, the Bribery Act 2010 and any applicable, associated statutory instruments / regulations and approved codes of practice. Please note that we have a separate policy for Corporate Social Responsibility in which we have identified applicable, relevant statutory, regulatory and voluntary requirements – including those published outside of the UK,

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other than those identified in this policy, relating to manufacturing of products abroad that we may purchase for inclusion in the delivery of our services.

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.

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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.

Adequate facilities and arrangements will be maintained within our employment practices to encourage 'whistle-blowing' i.e. to encourage employees or their representatives to raise issues such as suspected or identified breaches of this policy. Therefore, we have adopted the policy of 'whistleblowing' i.e. we encourage and we expect all employees, staff and other parties who provide services or products our organisation, to report any suspicion of illegal behaviour to management. Any such person making such a report will be afforded the full protection of the Company in relation to their employment by or engagement with, the Company so that there need be no fear of reprisal simply because of an honest concern being raised, subject to the outcome of investigation.

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.

Each individual has a legal obligation to act according to the applicable requirements of relevant UK, European and when appropriate other national 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.


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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)