

## Business Ethics Policy Statement

Irish Pressings expects and demands that each of its business units, all of its employees, and its Management and Directors carry out their business and perform their duties to the highest ethical standards and in compliance with all relevant legal principles. This standard of behaviour and performance is maintained in the company's dealings with employees, customers, suppliers, and all other stakeholders.

### General Principles

The company and its employees will at all times demonstrate the highest levels of integrity, truthfulness, and honesty in order to uphold both personal and corporate reputations and to inspire confidence and trust in their respective actions. The company will conduct its business in a competent, fair, impartial, and efficient manner.

### Health and Safety

The company is committed to providing a safe and healthy working environment for all of its employees both on and off its sites. There is a programme of regular health and safety audits and safety training. The company applies its standards to all visitors to its sites.

### Privacy

Irish Pressings promise to respect and look after all personal data shared with us. We will always keep it safe. We aim to be clear when we collect data, what we will use it for, and not do anything that would not be reasonably expected. We will never sell personal data to other organisations, and will only ever share it in appropriate, legal or exceptional circumstances.

We take privacy seriously and are committed to protecting personal information. We aim to be clear and open about our data and security practices.

Where we ask an individual to provide us with any information by which the individual be identified, Irish Pressings assure that it will only be used in line with General Data Protection Regulation (GDPR) legislation.

### Environment

The company respects the environment and the need to protect it and minimise the impact its operations have on it. It is engaged in a continuous programme of improvement on environmental issues and opens itself to independent third party verification, inspection, and certification of its progress. Irish Pressings operates a certified ISO14001 Environmental Management System.

### Intellectual Property

Intellectual property is a strategic asset at the heart of the Irish Pressings business and needs to be safeguarded. In certain circumstances, our employee's work may require sharing Confidential Information with third parties such as customers or suppliers. These disclosures should always be made with the utmost care, as sharing work in the wrong way could accidentally leak intellectual property to third parties and may prevent us from being able to adequately protect our intellectual property. Any disclosure should be made in accordance with the Company's policies and with the appropriate authority, sign-off and approvals. Just as we are committed to protecting our own intellectual property rights, we are likewise committed to respecting the brands, designs, and legally protected intellectual property of others. Violations of copyright and other

intellectual property rights, such as unauthorised copying of software or proprietary training materials, are both illegal and against Company policy.

#### Employees

All employees are treated with dignity and respect with equal employment opportunities given to all irrespective of their race, religion, gender, sexual orientation, maternity, marital status, family status, disability, age, or national origin. Employees are offered a safe and healthy workplace and the company will not tolerate any form of harassment.

#### Customers

The company will take care to avoid misleading statements, concealment, and overstatement in all of its advertising and public statements. It will seek to build long term partnerships with its customers by being honest and straightforward in its dealings at all times. It will respect the confidentiality of any information that it might obtain in relation to its customers.

#### Suppliers

Suppliers will be chosen on the basis of integrity, Health and Safety performance, quality, price and quality. The company's choice of suppliers will be made objectively. Honesty and openness will be paramount in the company's dealings with its suppliers.

#### Competitors

The company will build its reputation on the basis of its performance alone. It will compete vigorously and lawfully and will not compete unfairly with others. It will not seek to damage the reputation of its competitors either directly or by implication.

#### Government, Regulators, and Legislators

The company will comply with international, national, and local legislation affecting its operations.. It will meet its tax obligations. It will not make any financial contributions or offer support to any political party.

#### Financial Responsibility

It is Company policy to make full, fair, accurate, timely and understandable disclosure in compliance with all applicable laws and regulations in all reports and documents and in all other public communications made by the Company. Accurate and complete record keeping is essential to the corporate well-being of the Company and to enable it to comply with legal and regulatory requirements, to manage the affairs of the Company and to provide the best possible service to its customers. The Company adheres to a strict policy of maintaining complete and accurate books and records including, but not limited to, memoranda, expense reports, accounts, contracts, financial reports and other business or corporate records. The Company's books and records must reflect, in an accurate and timely manner, all business transactions. Undisclosed or unrecorded funds, other assets, or liabilities are not permitted. All persons are expected and required to prepare, preserve and produce all books and records in accordance with this policy

#### Giving and Receiving Gifts and Entertainment

Employees will neither seek nor accept for themselves or others any gifts, favours, or entertainment without a legitimate purpose from any person or business organisation that does or seeks to do business with, or is a

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### **Design - Prototypes - Tool Making - Metal Pressings**

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competitor of, FII Group. Gifts, favours, and entertainment may be given to others at the expense of the company as long as these are consistent with customary business practice and are not excessive in value.

#### Conflict of Interest

Conflict of interest may occur whenever your interest in a particular subject leads you to actions, activities or relationships that undermine our company. This includes situations like using your position's authority for your own personal gain or exploiting company resources to support a personal money-making business. Even when you seemingly act to the company's advantage, you may actually disadvantage it. For example, if an employee uses dubious methods to get competitor intel and raise their sales record, their action will have a positive impact on the company's revenue, but it will put us at a legal risk and promote unhealthy business practices.

If it turns out you have created a conflict of interest for yourself, you will be terminated. If the conflict of interest was involuntary (e.g. buying stocks from a company without knowing they're a competitor), we will take actions to rectify the situation. If you repeat the offence, you may be terminated.

#### Bribes and Corrupt Practice

The company does not allow the direct or indirect offer, payment, solicitation, or acceptance of bribes in any form. Any employee found to be involved in any kind of corrupt practice is likely to be immediately dismissed and may well have committed a criminal act which could lead to prosecution.

Signed: 

Declan Ward

Managing Director