

Supplier Code of Conduct

Irish Pressings is committed to the highest standards of business, environmental and ethical behaviour and to fulfilling our responsibilities to the local and global communities which we serve.

We are committed to the responsible sourcing of goods and services and this Supplier Code of Conduct sets out our expectations of those who provide these goods and services to the Company.

This code is informed by a number of international standards and guidance documents, including the UN Guiding Principles on Business and Human Rights.

This Supplier Code of Conduct is informed by a number of international standards and guidance documents – including the UN Guiding Principles on Business and Human Rights – and sets forth the minimum standards of business conduct that Fáisc Miotail Éireann (trading as Irish Pressings) expects from all of our suppliers:

1. Compliance with laws

Suppliers shall comply fully with all laws and regulations applicable to them.

2. Environmental sustainability

- i. Irish Pressings expects its suppliers to demonstrate a clear understanding of the environmental risks, impacts and responsibilities associated with the products and services they provide.
- ii. Suppliers should have in place an effective environmental policy, statement or program to mitigate environmental risks, the implementation of which should be evident throughout all levels of the company and should either have or have a document plan to implement ISO14001 into their organisation.
- iii. Suppliers should have processes in place to ensure that their operations conform to all applicable environmental legislation and all required environmental permits, approvals and registrations are to be obtained, maintained and complied with in accordance with the conditions and requirements defined therein.

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- iv. Environmental performance and emissions should be measured, monitored and reviewed regularly and the supplier should endeavor to make continuous improvements in environmental performance
 - v. Suppliers shall make practical efforts to eliminate or reduce levels of generated waste and should reuse and recycle waste materials wherever possible. The handling, storage, movement, treatment and disposal of all waste must be carried out in accordance with applicable regulations and in an environmentally responsible manner.
 - vi. Suppliers should consider the environmental credentials and performance of vendors within their own supply chain and require them to operate to a minimum set of standards.

3. Human Rights and Social Responsibility

Policies should be in place to confirm the supplier's commitment to bullet points 3.i - 3.xv, and improvement programs should be in place where relevant:

- i. Freedom from forced labor, bonded labor and human trafficking;
- ii. All employment shall be freely chosen by the worker. Workers shall be free to leave their employment at any time (subject to reasonable and paid notice periods) and shall not be subject to any coercion or restriction through, for example, the holding of original copies of employee passports, identity documents or monetary deposits;
- iii. There shall not be any use of bonded labor. Work must be undertaken for fair compensation and must not be undertaken to repay a debt incurred (i.e., as a result of deceptive recruiting practices);
- iv. Recruitment agencies: Where recruitment agencies/brokers are used by the supplier, appropriate due diligence and ongoing management must be undertaken to ensure that risks of worker exploitation, such as debt bondage, are effectively mitigated;
- v. Child labor: Suppliers should adhere to local laws relating to the minimum working age and not engage in the employment of child labor, directly or indirectly. According to the International Labour Organisation (ILO) minimum age convention (C138) of 1973, child labor refers to any work performed by children under the age of 12, non-light work done by children aged 12—14 and hazardous work done by children aged 15—17. Suppliers should also ensure that working

- hours for those of school age are not exceeding the maximum hours on a school day. In cases where child labor is found, programs should be in place to support the child into education;
- vi. Wages and benefits: At a minimum, the legal minimum wage standard must be adhered to across the entire workforce, employees should receive clear information on their wages, and unfair deductions from wages as a disciplinary measure are not permitted;
 - vii. Working hours: Working hours must be limited according to national or local law, including breaks. Overtime should be voluntary, should not replace regular employment and must be fairly compensated;
 - viii. Freedom of association, collective bargaining or parallel means: Employees have the right to join or form a trade union without facing discrimination or intimidation. Where freedom of association and collective bargaining is restricted under law, employees should have the right to develop parallel means;
 - ix. Health and safety and working conditions: A safe and hygienic working environment should be provided with an awareness of any industry-specific hazards. Relevant training should be provided to employees;
 - x. Regular employment: All employees should be provided with a written employment contract setting out their terms and conditions in accordance with the local relevant legal jurisdiction. We expect all employment and the termination of employment to be carried out in a fair manner;
 - xi. No harsh or inhumane treatment: Abuse, threat of abuse, and sexual or other harassment or intimidation should be prohibited by suppliers. Suppliers shall make available to all workers within their operations and supply chain a mechanism for which grievances relating to labour practices can be anonymously raised, without fear of retribution. Suppliers shall investigate and take appropriate action to remedy all grievances raised;
 - xii. Subcontracting: Where authorised subcontracting is used to support the execution of services for Irish Pressings as ultimate end-customer, the supplier shall confirm that the subcontractor meets the minimum expectations set out in Section 3 of this document;
 - xiii. Right to audit: Suppliers shall attain the right to audit over their suppliers to assess the working conditions and extent to which workers' rights are being upheld. Records of audits undertaken of the suppliers' supply chain shall be available on request;

- xiv. Incident response: Suppliers shall take the following actions, at a minimum, when an incident of forced labour, bonded labour, human trafficking or child labour is identified:
 - a. Disclosing the incident/high risk to relevant authorities
 - b. Disclosing the incident/high risk to Irish Pressings
 - c. Taking appropriate actions to remedy the incident
- xv. Demonstration of reasonable modern slavery due diligence: Irish Pressings expects that our suppliers will maintain an active view on the inherent risk of modern slavery in their supply chain

4. Diversity and inclusiveness

- i. Our sourcing decisions, contracts and management of supplier relationships will reflect and promote the principles of Diversity, inclusiveness and equal opportunity in that they will seek to ensure that suppliers do not victimise, harass or discriminate against any employee or party to the contract due to their sex, gender identity/expression, marital or civil partnership status, race, ethnicity or national origin, disability, religion, sexual orientation, age or part-time status;
- ii. Suppliers will be required to meet the requirements of any applicable discrimination legislation. Our suppliers will be treated fairly and equally during the tendering and purchasing process, with decisions made on the basis of clear selection criteria;
- iii. Irish Pressings expects suppliers to have a policy in place to consider usability by, and inclusion of, individuals with disabilities when designing products and/or delivering products/services to Irish Pressings. As part of the policy, there are accessibility standards and/or processes in place that conform to disability guidelines when suppliers are designing products and/or delivering services;
- iv. Irish Pressings expects suppliers to have a policy that explicitly bans discrimination/bullying and harassment based on sexual orientation, race, gender or gender identity/expression. In addition, suppliers are also encouraged to have evidence of diversity and inclusiveness training that is inclusive of sexual orientation and gender identity/expression;
- v. Irish Pressings expects suppliers to have equivalent measures to promote diversity in their supply chains and purchase from diverse businesses. Suppliers agree to make a reasonable effort to utilize diverse suppliers and provide evidence upon request.

5. Ethics

- i. The highest standard of integrity is expected in all of our business dealings. Any and all forms of corruption, extortion, bribery (including facilitation payments), and embezzlement are strictly prohibited and may result in immediate termination and legal action:
- ii. Suppliers will not offer or provide money or anything of value to any person if the circumstances indicate that it is probable that all or part of the money or other thing of value is being given to another individual or entity to influence official action or to obtain a business advantage.
- iii. Gifts or entertainment should never be offered to Irish Pressings personnel or representatives under circumstances that create the appearance of impropriety.
- iv. Suppliers must comply with all applicable trade control laws and regulations in the import, export, re-export or transfer of goods and services (including software and technology). All invoices and any customs or similar documentation submitted to Irish Pressings or governmental authorities in connection with transactions involving Irish Pressings must accurately describe the goods and services provided and the price thereof.
- v. Suppliers shall not share or exchange any prices, costs or other competitive information, or undertaking of any collusive conduct with any other third party to Irish Pressings with respect to any proposed, pending or current Irish Pressings procurement.
- vi. Suppliers will use only subcontractors or other third parties who comply with all applicable laws and regulations, and who adhere to the same (minimum) standards set forth in this guide.

Signed: *Declan Ward*

Managing Director

20/03/2024