

DUBLIN PORT COMPANY

CODE OF BUSINESS CONDUCT FOR EMPLOYEES

December 2011

INTRODUCTION

As employees of Dublin Port Company, we can be proud of the high standards of conduct which have characterised our commitment to the Company.

The following revised Code of Conduct sets out required standards of business behaviour for employees, and the values the Company wishes to promote, taking into consideration State guidelines. It is not intended to be an exhaustive list of guidelines for all possible eventualities. Individual departments may wish to provide additional guidance for their employees relevant to their own working arrangements.

OBJECTIVES

In order to achieve our corporate objectives, Dublin Port Company is obliged to conduct business, and be seen to conduct business, in a lawful manner and to promote high ethical business and personal standards. Integrity, confidence and trust must be the basis of all our corporate relationships. These standards of behaviour and values are set in the context of a commitment to excellence and a high quality service, while striving to maintain high levels of performance and personal responsibility.

The agreed set of ethical principles must be observed by employees at every level in dealing with customers, suppliers, colleagues, commercial companies and Government agencies. Appropriate behaviour at work must always be practiced, and each employee must perform their duties with efficiency, diligence and courtesy. Unethical practices must be strictly avoided or prevented.

COMPANY COMMITMENTS

The Company will comply fully with all legal requirements including environmental laws and regulations and will take into account legitimate employee interests. The promotion and preservation of the health and safety of employees will be of utmost importance.

The Company will ensure that community concerns are fully considered and will minimise any detrimental impact of our operations on the environment.

Dublin Port Company will operate a fair employment policy, which promotes equality and prohibits discrimination in the workplace across the nine grounds of gender, marital status, civil status, age, disability, sexual orientation, race, religion and membership of the Traveller community. Challenging opportunities for individual growth and advancement, open communication throughout the organisation, and a congenial work environment based on cooperative relationships will be a major priority.

APPLICATION OF THE CODE

The provisions of the Code apply to all employees, whether full-time, employed atypically, on contract, or those availing of special leave, and will form part of the terms of employment.

Each employee will be issued with a copy of the Code and they will be required to indicate in writing that they have received it. Clarification of any part of the document will be given, if required, by Heads of Departments. Breaches of the Code will constitute a breach of discipline and will be dealt with in accordance with our disciplinary codes.

CODE OF CONDUCT AND BUSINESS ETHICS

1. INTEGRITY

1.1 All employees of Dublin Port Company will act with honesty and integrity in their dealings with customers, suppliers and other parties, whether internal or external, with whom the Company is involved.

1.2 Employees will not engage in any outside activity which would, in any way, impair their ability to perform their duties to the Company.

1.3 The use of Company resources or time for personal gain, for the benefit of persons/organisations unconnected with the Company, or for the benefit of competitors is prohibited.

1.4 Employees will not appropriate to their own use Dublin Port property, equipment or facilities.

1.5 Employees will not become personally or financially involved in any outside business which would be in competition with, or in conflict with, the interests of Dublin Port Company.

1.6 It is the responsibility of every employee, including management at every level, to disclose to their appropriate Head of Department any private interest which might constitute a conflict of interest and to comply with any directive in relation to such involvement. A confidential register of such interests will be maintained by the Secretary of the Company. Where the situation arises, in relation to the Chief Executive, he/she shall discuss the matter with the Chairman of the Company.

1.7 Employees and management will declare, in writing, any potential conflict of interest that might affect their impartiality in carrying out their duties.

1.8 No employee at any level in the organisation should be involved in the making of a recommendation or decision on a transaction which could benefit or otherwise materially affect another party with which a family relationship exists or from which a financial benefit might accrue to the employee concerned, whether from investments or otherwise.

1.9 Employees, particularly those in a position of authority or influence, will not use their position to obtain facilities or personal arrangements which are not authorised at the appropriate level in Dublin Port Company.

1.10 Management and employees will ensure that the Company's accounts/reports accurately reflect our business performance, and are not misleading, or designed to be misleading.

1.11 Employees should not solicit or accept sponsorship or gifts, for the Company, or for events involving Dublin Port Company employees, where this could be deemed to influence or otherwise compromise a Company decision relating to any transaction with the donor.

1.12 Under no circumstances, may cash or cash vouchers be accepted by a member of staff.

1.13 Likewise, employees may not approach any Company with which they have contact through their official duties seeking sponsorship or support for any club, association, trade union or other organisation. Heads of Departments may apply discretion in the application of this rule to instances of small patronage.

1.14 Employees should not accept special facilities or discounts on private purchases from suppliers with whom they have official dealings.

2. **INFORMATION**

2.1 An employee of Dublin Port Company must not disclose confidential, personal, or commercially sensitive information (e.g. future plans, or details of major organisational or other changes such as restructuring) obtained by her/him relating to Company affairs.

2.2 Employees, except those who are authorised, will not give interviews regarding the activities of Dublin Port Company, other than at the request of the Chief Executive.

2.3 Employees, when presenting papers to external groups / meetings etc., or when attending conferences, are encouraged to present Dublin Port Company in a positive light.

2.4 Employees will not use or associate the name of Dublin Port Company with any act, function, organisation, society, club or business, except with the written permission of the Company. This does not preclude employees on a personal basis from being involved in social and other voluntary organisations.

2.5 With respect to confidential disclosures, any staff member, may, in confidence, with their Head of Department or any other Senior Manager, raise concerns about possible financial irregularities in financial reporting or other matters. It is the responsibility of the Manager with whom the matter was raised to ensure meaningful follow up of matters raised in this way.

3. **OBLIGATIONS**

3.1 In all transactions, employees will ensure that business is conducted in the best interest of the Company, having regard to company policy, rules and legislative requirements.

3.2 Employees will comply strictly with the tendering, procurement and approvals procedures current at the time. The appropriate Head of Department is in a position to clarify this.

3.3 Controls to prevent fraud, including controls to ensure compliance with prescribed procedures in relation to claiming expenses for business travel, will be observed at all times.

3.4 In the event of employees' services being contracted out, or post resignation/retirement alternative employment occurring, conflict of interest must be avoided and confidentiality maintained.

3.5 Employees will abide by safety and health regulations as specified in the Company's Health and Safety Statement.

4. **BEHAVIOUR AT WORK**

4.1 Employees will attend at work as required and, where necessary to absent themselves from duty, will adhere to the agreed procedures in taking leave.

4.2 The terms of the sick leave regulations will be complied with.

4.3 Employees will act in a manner consistent with the proper performance of the function of their position, including refraining from conduct such as drug or alcohol abuse, which might impair work performance.

4.4 It must be ensured that non-discriminatory language is used in all communications, including display material and documents in electronic form.

4.5 Due care and attention must be exercised in the use of the Company's property, premises, equipment, resources and funds, and employees will not cause or permit damage or defilement, or use them for unauthorised purposes.

4.6 Due respect will be shown to colleagues at work, including respect for their values and beliefs.

4.7 An employee's behaviour should not endanger or cause distress to their colleagues, or contribute to disruption in the workplace.

4.8 The policy on harassment, sexual harassment and bullying will be observed and supported by all employees.

4.9 Employees will ensure that their standard of dress and personal appearance is appropriate to their work environment and shows due consideration and respect for colleagues.

4.10 Compliance with employment, equality and equal status legislation is essential, as well as the duty not to discriminate against colleagues on the basis of gender, race, sexual orientation, membership of the traveller community, disability, age, marital status, civil status and religious belief.

4.11 Employees will value and treat customers equally and will be committed to fairness in all business dealings.

5. **LOYALTY**

5.1 All employees have a primary duty to Dublin Port Company as their employer.

CONCLUSION

The good reputation of Dublin Port Company as an organisation which maintains the highest standards of integrity in all its business dealings is dependent on all employees complying with both the letter and spirit of this code of conduct.

Nothing in this code will modify or preclude the obligation of employees to conform with other rules, regulations and procedures relative to particular groups or situations.

If any employee is concerned at any time as to whether a particular situation contravenes any part of this code, s/he should immediately discuss the matter with his/her appropriate Head of Department, or in the case of the Chief Executive s/he should discuss the matter with the Chairperson of the Company.