



ESG Programme Supplier Code of Conduct

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- Editorial, formatting, and spelling
- Clarification

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1. Introduction and Purpose

The purpose of this Supplier Code of Conduct is to clearly articulate Dublin Port Company's (DPC's) expectations and requirements for all Suppliers. As a commercial semi-state body, we are committed to providing safe, efficient, sustainable, socially responsible, and world-class port services. This Code ensures that our Suppliers align with our values and contribute to our mission of serving in the public interest. DPC is subject to the Public Procurement Directive 2014/25/EU and National Procurement Guidelines. By adhering to the principles of this Code, Suppliers contribute to responsible business practices and sustainable development.

2. Scope and Applicability

This Code applies to all Suppliers, including third-parties, professional services firms, business partners, contractors, sub-contractors and agents ***engaged to supply goods, services or works*** to or on behalf of DPC. Suppliers are required to ensure that their employees, contractors, consultants, and second-tier suppliers are advised of and comply with this Code.

3. Our Commitment

DPC is committed to complying with the highest standards of governance and is guided by our values of honesty, openness, care, and accountability. We act with courage and integrity, striving for excellence in all that we do. We seek to engage in business with like-minded entities that share these principles and values. We offer equal opportunities to suppliers, including small and medium-sized enterprises (SMEs), where applicable.

4. Key Principles

4.1 Ethical Business Practices

Suppliers shall:-

- Comply with all applicable laws, regulations, directives, industry standards and best practices
- Conduct business with integrity, avoiding any form of corruption, bribery, or fraudulent practices
- Maintain accurate books and records
- Avoid conflicts of interest and report any potential conflicts to DPC
- Refrain from offering gifts, gratuities, or favours that may influence business decisions
- Protect confidential information and intellectual property
- Comply with competition and antitrust laws.

4.2 Environmental Responsibility

Suppliers are expected to, where applicable:-

- Implement and maintain an environmental management system (e.g. ISO 14001 or similar in-house equivalent)

- Work towards setting targets for reducing greenhouse gas emissions
- Adopt circular economy principles in product design and lifecycle management
- Conserve water and energy resources
- Protect biodiversity and ecosystems
- Minimise waste generation and promote recycling
- Develop products and services that are energy-efficient and reduce environmental impact

4.3 Social Equity and Human Rights

Suppliers are expected to:-

- Respect and uphold human rights as defined by the United Nations Declaration of Human Rights and the International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work
- Prohibit child labour, forced labour, and human trafficking
- Ensure non-discrimination and equal opportunity in employment practices
- Provide safe and healthy working conditions
- Respect freedom of association and the right to collective bargaining
- Pay fair wages that meet or exceed legal minimums and industry standards
- Promote diversity and inclusion in the workplace
- Support local communities and engage in responsible sourcing practices.

4.4 Governance and Transparency

Suppliers are expected to:-

- Maintain transparent and accountable governance structures
- Implement risk management processes
- Ensure compliance with data protection, information security and privacy regulations
- Pay suppliers on time and within agreed payment terms
- Provide sustainability information in accordance with relevant reporting standards
- Cooperate fully with any audits or assessments conducted by DPC or its representatives.

5. Specific Compliance Measures

Suppliers are expected to:-

- Conduct regular risk assessments to identify potential environmental and social risks in their operations and supply chains
- Implement policies and procedures to address identified risks
- Provide training to employees on sustainability, ethics, and compliance topics
- Establish grievance mechanisms for stakeholders to raise concerns
- Conduct regular internal audits to ensure compliance with this Code and applicable regulations
- Participate in sustainability assessments and audits as requested by DPC

- Develop corrective action plans to address any identified non-conformities.

6. Reporting Standards and Metrics

Suppliers are expected, where required, to report on the following key performance indicators:-

- Monitor and report scope 1 and 2 carbon emissions, and scope 3 carbon emissions
- Energy consumption and renewable energy usage
- Water consumption and wastewater management
- Waste generation, recycling rates, and circular economy initiatives
- Occupational health and safety incidents
- Diversity and inclusion metrics
- Human rights impact assessments and remediation actions
- Supply chain due diligence processes and outcomes
- Anti-corruption and ethics training completion rates
- Environmental and social certifications obtained.

7. Implementation and Continuous Improvement

DPC is committed to supporting Suppliers in implementing this Code through:-

- Providing guidance and resources on sustainability and compliance topics
- Offering training and capacity-building programmes
- Facilitating knowledge sharing and best practice exchange
- Collaborating on innovative solutions to sustainability challenges

Suppliers are encouraged to:-

- Continuously improve their sustainability performance
- Set targets and track progress
- Share practices and success stories
- Participate in industry initiatives and multi-stakeholder partnerships.

8. Raising Matters of Concern and Whistleblowing

DPC maintains a confidential reporting process for employees, contractors, and other stakeholders to raise concerns about unethical, inappropriate, or illegal behaviour. Suppliers are encouraged to:

- Establish their own whistleblowing mechanisms
- Report any violations of this Code to DPC
- Cooperate fully in any investigations related to reported concerns
- Protect whistleblowers from retaliation.

9. Code of Conduct Review

This Code of Conduct is subject to regular review and updates. DPC and Suppliers shall actively seek ways to improve it, both in terms of content and extending compliance throughout the supply chain.