

# **DUBLIN PORT COMPANY**

## **Code of Conduct for Employees**

**30 MAY 2025**

*This Employee Code of Conduct ("**Code**") belongs to and was created by Dublin Port Company.*

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# DUBLIN PORT COMPANY

## 1 INTRODUCTION AND OBJECTIVES

### 1.1 Introduction and Scope

This Code of Conduct (this “**Code**”) applies to all employees and contractors (please note that references to Employees throughout this Code includes references to contractors engaged by or working with Dublin Port Company (the “**Company**”) and any subsidiary and/or associated companies of Dublin Port Company.

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 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.

To prepare and have published a Code of Conduct for Employees is a requirement of the Code of Practice for the Governance of State Bodies (the “**Code of Practice**”) which applies to the Company as a State body. This Code also aligns with relevant Environment, Social and Governance (ESG) legal and regulatory requirements, such as the Climate Action Framework for the commercial semi-state sector.

### 1.2 Objective

In order to achieve our corporate objectives, the Company is obliged 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.

The primary objective of this Code is to emphasise the Company’s commitment, as a State body, to the highest standard of conduct through:

- establishing and setting down an agreed set of ethical principles;
- promoting and maintaining confidence and trust in the Company;
- seeking to prevent the development or acceptance of unethical practices through a focus on the principles of control and integrity;

While this Code references certain legislation, guidelines and rules, it is not a detailed legal summary of all these provisions. Employees of the Company are expected to familiarise themselves with the provisions of this Code.

## 2 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.

### **What's required?**

- Follow all the health & safety policies and procedures that apply to your work.
- Attend any training that is provided on those policies and procedures.
- Stop and Ask if you see something that can be improved or if you're not sure how to do something safely.
- Managers and directors bear a particular responsibility to provide clear leadership on health & safety issues.

### **What to look out for**

- Any unsafe practice – even if it is being sanctioned by a member of management.
- Any risk that has not already been spotted and where improvements can be made

The Company will ensure that community concerns are fully considered and will minimise any detrimental impact of our operations on the environment and society. We are committed to continuous improvement in our sustainability performance and to transparent reporting on our progress.

The Company will operate a fair employment policy, which promotes equality and prohibits discrimination in the workplace across the grounds of gender, marital status, civil status, age, disability, sexual orientation, race and ethnic origin, religion, political opinion, national extraction, social origin 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 are a major priority.

The Company is committed to integrating sustainability into all aspects of its operations. We recognise our responsibility to contribute to sustainable development and to minimise our environmental impact. All employees are expected to consider the environmental and social implications of their decisions and actions in their daily work.

The Company is committed to being a responsible corporate citizen. We respect human rights, promote diversity and inclusion, and actively engage with our local communities. Employees are encouraged to participate in company-sponsored community initiatives and to suggest ways in which we can positively impact our society.

## **3 CONFIDENTIALITY AND INFORMATION**

### **3.1 Confidentiality Requirements**

Both current and former employees must at all times keep matters pertaining to the Company confidential and secure, save as approved by the Company in the course of its business.

An employee of the Company must not disclose sensitive information held by the Company, including material such as commercially sensitive information (including, but not limited to, future plans or details of major organisational or other changes such as restructuring); personal information; and information received in confidence by the Company, unless authorised to do so.

### **3.2 Data protection requirements**

All employees must be aware of their obligations under the relevant data protection legislation. It is crucial to understand that any breach of these laws not only jeopardises the rights of third parties and colleagues but can also expose the Company to significant reputational harm. For detailed guidance on your responsibilities and the procedures in place, please refer to the Company's Data Protection Policy.

### 3.3 Social Media Use and Press and Media Communications

Sitting alongside these confidentiality obligations, as part of the 2024 update of this Code, the Company has included the below requirements to minimise the risks to the Company through use of social media and press and media communications. These requirements apply to all employees of the Company.

These requirements include in respect of the use of all forms of social media, including (but not limited to) Instagram, Snapchat, Tik Tok, Facebook, LinkedIn, X, Google+, Wikipedia, Whisper, Instagram, Tumblr and all other social networking sites, internet postings and blogs. It applies to use of social media for business purposes as well as personal use that may affect the Company's reputation in any way.

Additionally, these requirements encompass all and any public comments given to all forms of media including (but not limited to) print media, broadcast media (such as television and radio), digital media (including social media and online platforms), and all other communication channels.

**Requirements:** The below requirements expressly specify social media use, but shall apply equally to all forms of press and media communications.

- Personal use of social media should not involve unprofessional or inappropriate content. As an employee of the Company, your views on social media may impact on the Company's business or reputation, whether directly or indirectly. Where an employee is stating an opinion on social media, he/she is required to reflect it is your own personal opinion and not that of the Company's.
- Employees must not express opinions on the Company's behalf via social media, unless expressly authorised to do so by the Company.
- Employees must not use social media to defame or disparage the Company, its employees or any third party linked to the Company's business; to harass, bully or unlawfully discriminate against employees of the Company or third parties; to make false or misleading statements; or to impersonate colleagues or third parties. Be respectful to others when making any statement on social media and be aware that an employee is responsible for all communications which will be published on the internet for public viewing.
- Employees must not post comments about sensitive business-related topics, such as the Company's performance, or do anything to jeopardise the Company's trade secrets, confidential information and intellectual property. Employees must not include Company logos or other trademarks in any social media posting or in his/her profile on any social media.
- An employee should also ensure that his/her profile and any content he/she posts is consistent with the professional image he/she presents on behalf of the Company.
- If an employee is uncertain or concerned about the appropriateness of any statement or posting, he/she should refrain from posting it until such time as he/she has discussed it with a member of the HR Department or the Executive Management Team.
- Where an employee sees social media content that disparages or reflects poorly on the Company, he/she should contact a member of the HR Department or the Executive Management Team..
- Where it is believed that an employee has failed to follow these requirements or has brought the Company into disrepute by his/her use of social media, he/she will be required to co-operate with any investigation and may be required to remove any social media content which is considered by the Company to constitute a breach of these requirements.

### **3.4 Press and Media Communication**

Employees should not comment or provide an interview to the press or media without the prior approval of the Company. No such statement shall be made without the approval of the Company in line with Company strategy and policy.

Upon termination of employment or engagement by the Company, employees shall not make public comments to press, media or social media about Company business without first consulting with the Company to seek approval for such media commentary whether on their own behalf or in response to queries.

### **3.5 External Events, Meetings and Functions**

Employees, when presenting papers to external groups and/or meetings or when attending conferences, are encouraged to present the Company in a positive light.

Employees will not use or associate the name of the 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.

### **3.6 Information**

While providing access to general information relating to the Company's activities in a way that is open and enhances its accountability to the general public, the Company shall also observe appropriate prior consultation procedures with third parties where, exceptionally, or subject to legal requirements, it is proposed to release sensitive information in the public interest and comply with all relevant regulatory obligations and statutory provisions relating to the handling of information including data protection, freedom of information and market abuse legislation.

## **4 CONFLICTS OF INTERESTS**

### **4.1 Introduction**

Employees should at all times act in the best interests of the Company. Employees should avoid any conflicts between their duties to the Company and their other (including personal) interests. Employees should not be involved in outside employment or business interests which are in conflict, or in potential conflict, with the business of the Company.

A conflict of interest exists in any situation where the personal or other interest of an employee might in any way affect the duties of an employee of the Company. It makes no difference that the Company does not suffer as a result of the conflict of interest.

An employee must not under any circumstances obtain any personal benefit in connection with their employment with the Company and must at all times disclose the existence or potential existence of such an interest or potential interest.

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.

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.

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

contact **a member of the HR Department or the Executive Management Team.** to discuss any potential or existing conflicts of interest.

#### 4.2 **Protected Disclosures Legislation**

As referred to in the Code of Practice, Section 21 of the Protected Disclosures Act, 2014 requires that every public body shall establish and maintain procedures for the making of protected disclosures by workers who are or were employed by the public body and for dealing with such disclosures. Written information in relation to those procedures must be provided to workers employed by the public body.

The Company's protected disclosures/whistleblowing policy can be found [LINK](#).

### 5 **GIFTS AND OTHER BENEFITS**

An employee must not obtain personal advantage from any person dealing with or attempting to deal with the Company.

In particular, an employee must not give or accept any gifts, hospitality, preferential treatment or benefits which might affect or appear to affect the ability of the donor or the recipient to make independent judgement on business transactions or inducements where the value of such could make it appear that the donor is attempting to influence the employee to gain advantage.

A gift can be anything with a cash or face value, such as a bottle of wine or tickets to an event where the giver/host is not present. Any such gifts or inducements received shall be returned tactfully with the request that no gifts be forwarded in future. Any employee who is unsure whether he/she is in breach of this Code shall refer the matter to **a member of the HR Department or the Executive Management Team (EMT)** for direction.

For the purposes of this Code, hospitality or entertainment involves attendance at an event where a guest is present. The Code applies whether the Company is the host or a guest.

- Hospitality which is excessive, either in frequency or value, can be perceived as an inducement to win or secure new business and is not permitted.
- Employees are permitted to provide hospitality if it is of reasonable and appropriate value and if it is customary to give or receive such hospitality in the ordinary course of business

Examples of acceptable hospitality and entertainment might be dining out or tickets to a sporting event, theatre or music concert where this does not place, or could not be construed as placing, the recipient under any obligation.

- Employees must obtain written consent from your expenses approver or an EMT member before offering hospitality exceeding €100 (or local currency equivalent) in value, and the hospitality must comply with the rest of this policy. If the expenses approver or an EMT member has any concerns over this hospitality, they must refer it to the Internal Auditor before allowing it.
- Employees are permitted to accept corporate hospitality of reasonable and proportionate value, if it is customary to receive such hospitality in the ordinary course of business. Examples of acceptable hospitality and entertainment might include dining out or tickets to a sporting event, theatre or music concert.
- If an employee is offered hospitality or entertainment that falls outside of this exception, they must politely but firmly refuse it.

If an employee reasonably considers that acceptance would be in the best interests of the Company (for example, because the refusal of hospitality might cause offence), they should seek the prior written consent of expenses approver or an EMT member before accepting the invitation.

Under no circumstances, may cash or cash vouchers be accepted by an employee.

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.

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

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 the Company.

## **6 INTEGRITY, DIGNITY AND RESPECT**

Every employee deserves to be treated with dignity and respect, regardless of their background or role. The Company is committed to fostering an inclusive environment for all employees.

All employees of the 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.

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

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.

Employees will not appropriate to their own use Company property, equipment or facilities.

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.

Employees of the Company are committed to:

- (i) competing vigorously and energetically but also ethically and honestly;
- (ii) conducting its purchasing activities of goods/services in accordance with best business practice;
- (iii) ensuring a culture of claiming expenses only as appropriate to business needs and in accordance with good practice in the public sector generally;
- (iv) avoiding the use of the Company's resources or time for personal gain, for the benefit of persons/organisations unconnected with Company or its activities or for the benefit of competitors;
- (v) not acquiring information or business secrets by improper means;
- (vi) complying with employment, equality and equal status legislation;
- (vii) being fair in all its business dealings and valuing customers and treating all customers equally;
- (viii) promote the development of a culture of 'speaking up' whereby workers can raise concerns regarding serious wrongdoing in the workplace without fear of reprisal;



- (ix) placing the highest priority on promoting and preserving the health and safety of the Company's employees;
  - (x) ensuring that community concerns are fully considered;
- 6.1 transparency in our operations and decision-making processes, within the bounds of commercial sensitivity and data protection requirements. We will maintain open communication channels with stakeholders and provide clear, accurate, and timely information about our sustainability performance and impacts, and;
- (xi) minimising any detrimental impact of the Company's operations on the environment.

## **7 GENERAL CONDUCT**

Employees of the Company shall:

- (i) fulfil all regulatory and statutory obligations imposed on the Company as a corporate body and State owned entity;
- (ii) comply with detailed tendering and purchasing procedures, as well as complying with prescribed levels of authority for sanctioning any relevant expenditure;
- (iii) introduce controls to prevent fraud including adequate controls to ensure compliance with prescribed procedures in relation to claiming of expenses for business travel;
- (iv) always be guided in their actions by the statutory and regulatory provisions to which they are subject as well as by their general responsibilities to act lawfully, faithfully, competently and in the best interests of the Company;
- (v) discharge their duties and responsibilities with the highest standards of integrity;
- (vi) co-operate with internal audit in the internal audit process;
- (vii) Follow all accounting and financial reporting procedures, comply with financial controls.
- (viii) conform with procedures laid down by the Board in relation to conflict of interest situations, including in regard to acceptance of positions following employment and/or engagement by a State body that may give rise to the potential for conflicts of interest and to confidentiality concerns;
- (ix) acknowledge the duty of all to conform to highest standards of business ethics; and
- (x) acknowledge the responsibility to be loyal to the Company and fully committed in all its business activities while mindful that the organisation itself must at all times take into account the interests of its shareholder.

## **8 ENVIRONMENTAL STEWARDSHIP**

Dublin Port Company is committed to environmental protection and sustainable practices. Employees are expected to:

- (i) Minimise waste and promote recycling in all operations;
- (ii) Conserve energy and water in the workplace;
- (iii) Consider environmental impacts in decision-making processes;
- (iv) Report any environmental concerns or incidents promptly;
- (v) Actively participate in the Company's environmental initiatives;

- (vi) Suggest improvements for reducing our environmental footprint.

The Company recognises the urgent need to address climate change. Employees are expected to support our emissions reduction goals by:

- (i) Minimising unnecessary travel and promoting virtual meetings where possible;
- (ii) Supporting energy efficiency initiatives in the workplace;
- (iii) Considering climate impact in project planning and decision-making;

8.1 Participating in carbon literacy training when offered.

## **9 SUSTAINABLE PROCUREMENT**

Employees involved in procurement decisions must consider sustainability criteria alongside traditional factors such as cost and quality. This includes:

- (iv) Evaluating suppliers' environmental and social performance;
- (v) Favouring suppliers with strong sustainability credentials where feasible;
- (vi) Encouraging suppliers to adopt sustainable practices;

9.1 Considering the full lifecycle impact of procured goods and services.

## **10 BEHAVIOUR AT WORK**

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

The terms of the sick leave policy will be complied with.

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

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.

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

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

The following policies should be observed and followed by all employees in support of this Code of Conduct Policy:

1. Diversity & Inclusion
2. Dignity at Work
3. Recruitment & Selection

In respect to our building, vehicles and IT, it is important that we follow all internal policies and procedures on the use of DPC's property while ensuring that IT security is maintained. Failing to maintain or breaching IT standards can expose the business to fraud or loss of confidential or personal information.

## **11 RESPONSIBILITY**

This Code will be issued to all employees for their retention and each employee shall acknowledge his/her receipt and understanding of same to the HR Department. Clarification of any part of the Code will be given, if required, by Heads of Departments. This policy may also be made available to any relevant interested parties /stakeholders on request.

Employees are encouraged to proactively contribute to the Company's sustainability efforts and to report any practices that may be inconsistent with this policy and our environmental and social commitments.

## **12 RAISING A CONCERN**

Employees are encouraged to report concerns about unethical, unsafe, or unlawful conduct. Reports can be made confidentially and without fear of retaliation. The Company maintains a Protected Disclosures Policy in line with the Protected Disclosures Act 2014 [LINK](#).

Within DPC you can contact your line manager, the HR Department (hr@dublinport.ie) or a member of the Executive Management Team.

## **13 CONCLUSION**

The good reputation of the 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.

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.

While this Code of Conduct primarily applies to employees, DPC is committed to upholding these ethical standards in all interactions. Our Protected Disclosures Policy outlines the mechanisms through which external stakeholders can report any concerns regarding potential inconsistencies with this Code.

## **14 FAILURE TO COMPLY WITH CODE OF CONDUCT**

Failure by an employee to comply with this Code will be dealt with in accordance with our disciplinary procedure and may result in disciplinary action up to and including dismissal. Or, in the case of contractors, the contract may be terminated.

## **15 REVIEW**

This revised and amended Code was updated on 19<sup>th</sup> May 2025 and will be reviewed annually.