

Euroforest Group – Code of Conduct and Ethics Policy (Irish / EU Version)

1.0 Introduction and Corporate Values

Euroforest is a long-standing business founded on mutual trust, loyalty and public confidence.

These attributes have been earned over a substantial period of time by the successive generations of people who have worked tirelessly in the business.

It has always been the Company's ethos and practice to encourage and promote self-motivated employees, permitting levels of flexibility and autonomy in conducting the harvesting and marketing of timber products. This also brings particular responsibilities to each and every individual to adhere to the highest level of integrity, openness and honesty.

This professional standing and reputation can be ruined overnight by any unintentional and/or deliberately irresponsible or unethical behaviour. Euroforest Ireland do not tolerate bribery or corruption under any circumstances, whether direct or indirect.

Purpose and Scope of this Policy

The purpose of this Policy is to set out the enduring principles which have traditionally been observed throughout the Company, with clear guidance on how these should be applied and to underpin governing Irish and EU legislation.

These corporate principles or values are:

- Integrity in personal and business life
- Fidelity and loyalty
- Self-respect and honesty

These are the minimum standards of conduct the Company expects from all its employees.

The policy applies to:

- Employees at all levels
- Directors and managers
- Contractors, consultants and temporary staff
- Agents, intermediaries, suppliers
- Any person acting on behalf of the company

2.0 Integrity

Integrity applies to being fully worthy of the trust placed in us by our clients, colleagues and employer by being honest, impartial and truthful.

This means:

- Acting at all times in an honest manner in both corporate and personal dealings; recognising that personal conduct reflects on the company and may expose it to risk;
 - Scrupulously refraining from illegal, fraudulent, dishonest or unethical conduct, particularly in relation to financial and/or business dealings;
 - Never using confidential information for personal gain or abusing the trust of anyone with whom business is being done on our behalf;
 - Avoiding conflicts between self-interest and the interests of the employer or customer, and being ready and willing to disclose any potentially compromising or conflicting business relationships or shareholdings;
 - Ensuring that contracts are managed transparently and in accordance with company procedures, maintaining trust and confidence between employer and employee;
 - Avoiding gifts, services or hospitality at a level inconsistent with your role which could be interpreted as affecting integrity or the ability to exercise independent judgment;
 - Ensuring that all outside business interests or activities which may affect the Company are disclosed.
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3.0 Fidelity

Fidelity is about faithfulness to our corporate objectives and culture, and the duty of loyalty and confidentiality in dealing with business matters and those of our clients.

This means:

- Promoting the good standing and name of the company and bringing to its immediate attention any adverse comments or publicity;
- Ensuring that all business transactions are transparent and in accordance with the Company's ethics and reputation and beyond reproach;
- Ensuring that any undertakings given within personal capacity are fully achieved;
- Safeguarding all company information and restricting access to confidential or sensitive documents;
- Keeping customers' business, financial and personal affairs confidential by not disclosing information to third parties without their express consent, except where required by law or established company practice;
- Complying with communication protocols and the **General Data Protection Regulation (EU) 2016/679 (GDPR)** and the **Data Protection Act 2018 (Ireland)**;
- Complying fully with legislation and regulations particular to the forestry industry and your employment, including the **Safety, Health and Welfare at Work Act 2005**, the

Environmental Protection Agency Act 1992, and the EU Timber Regulation (EU) No 995/2010;

- Not knowingly engaging in business which might in any way be associated with, or regarded as supportive of, illegal or criminal activities, bribery or corruption.
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4.0 Self-Respect

Self-respect is enhanced by professionalism, conscientiousness and taking personal responsibility.

This means:

- Maintaining your dignity and promoting that of fellow employees by not bullying or victimising colleagues for any reason and by promoting equal opportunities within the company;
 - Acquiring the necessary skills, knowledge and experience to conduct business dealings or tasks in a professional manner and keeping abreast of current developments;
 - Acting with the utmost courtesy at all times;
 - Giving due consideration not just to the immediate financial effects of decisions but also to their wider implications; avoiding practices which could adversely impact on the business or which could lead to allegations of fraud or misrepresentation;
 - Taking responsibility and immediately reporting to a senior Manager where difficulties arise in matters of professional judgment or conduct;
 - Proactively engaging in teamwork and recognising everyone's contribution to success.
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5.0 Bribery

The **Criminal Justice (Corruption Offences) Act 2018** created offences for both individuals and corporate bodies in respect of giving or receiving bribes or corrupt advantages. Euroforest reviews all relevant Irish and EU legislation on a quarterly basis, and any changes to legislation or supporting regulations will be reflected in updates to this policy and procedure.

Bribe means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.

It is our policy to conduct all business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all business dealings and relationships.

We provide training through our in-house platform **EdApp** on Anti-Bribery and Anti-Corruption. This training is mandatory for all staff.

All forms of bribery are strictly prohibited. If you are unsure whether a particular act constitutes bribery, raise it with your manager.

This includes:

- Ensuring that any project, sale or purchase is managed on an objective basis and not tied to any form of reciprocal agreement;
- Maintaining company records and systems so that all transactions are recorded accurately and promptly;
- Reporting to the appropriate internal authority any behaviour which contravenes legislation, regulatory requirements, or this Policy.

The Managing Director, **Paddy Bruton**, holds overall responsibility for investigating any suspected contravention.

Any suspected breach should be reported in accordance with the **Euroforest Group Whistleblowing Policy**. Protection will be provided in accordance with the **Protected Disclosures (Amendment) Act 2022**.

Further advice can be obtained from **Human Resources Manager, Zaneta Korzeniecka**, or **Head of Compliance, Paul Medley**.

Failure to comply with this policy may result in disciplinary action, including dismissal for gross misconduct, and potential criminal proceedings under the **Criminal Justice (Corruption Offences) Act 2018**.

6.0 Conflict of Interest

Employees are expected to act ethically, honestly and with the highest standard of personal integrity at all times. All employees must conduct the company's business in accordance with applicable Irish and EU legislation.

Employees should not engage in any activity, practice or conduct which conflicts with, or appears to conflict with, the interests of the company, its customers or suppliers.

An actual or potential conflict of interest occurs when an employee can influence a decision that may result in personal gain for that employee or a relative as a result of the company's business dealings.

7.0 General Conduct

Employees must not act in any way which might bring the company into disrepute and must always act with the utmost integrity and honesty in all personal and business dealings.

Any known or suspected breaches of rules or regulations, including those by fellow employees, must be reported to a senior Manager or another appropriate manager as soon as these come to light.

8.0 Receiving Gifts and Benefits

Employees may not accept or give any gift, hospitality, or other personal benefit from or to any third party likely to influence (or appear to influence) their judgment or conflict with their duties to Euroforest.

Any offers of gifts or hospitality must be immediately declared to a senior Manager, who will assess any risk and advise on the appropriate procedure for declining or recording the offer.

Below is a list giving details of what is acceptable and not acceptable to give or receive to terms of what constitutes a bribe.

Acceptable gifts and hospitality which can either be given or received	Unacceptable gifts and hospitality which can either be given or received
Non recordable Stationary (pens, rulers, pads, calendars, etc) Mugs Bottles of standard wines and spirits, but not in large quantities. Corporate clothing	Cash in any quantity Works to private property Jewellery, electronic or personal items 1 st Class travel abroad. Holidays either at home or abroad. Cars or any other vehicle.
Recordable Meals Hospitality at sporting or other events within the UK. Trips either home or abroad tied in with related business. Overnight accommodation in relation to meals hospitality or trips. Items of clothing	

The above lists are for guidance and are not exhaustive.

Prior to giving or receiving gifts deemed acceptable and recordable authorisation must be received from the respective Director or Managing Director

A register will be kept detailing all recordable gifts and hospitality given and received. The register will include the following details:

- Name of employee/s giving or receiving the gift or hospitality.
- Name of the person and their company giving or receiving the gift or hospitality.
- Date received or given
- Details of the gift or hospitality

Directors/Managers and Staff are required to email any gifts given or received to Ciara.kearney@euroforestireland.ie, who will then log these on the anti-bribery register.

This protects both the employee and the Company's reputation.

9.0 Communications

Employees must maintain the highest standards of professionalism and integrity in all communications — verbal, written or electronic.

Communications are subject to the **GDPR (EU) 2016/679**, the **Data Protection Act 2018 (Ireland)**, and company IT and confidentiality procedures.

Sensitive or confidential information must only be transmitted using prescribed secure company channels.

10.0 Site Security and Fraud Prevention

In the interests of safety and fraud prevention, the company reserves the right to:

- Conduct searches of company vehicles, offices, files, or sites used for business transactions;
- Carry out spot-check site visits;
- Monitor workplace telephone, e-mail, and internet usage where appropriate and lawful under the **Data Protection Act 2018** and the **ePrivacy Regulations 2011**.

Information obtained from such monitoring may be used as evidence in disciplinary proceedings.

11.0 Authority

The Managing Director holds overall authority for this Policy and ensuring that it is always complied with.

Line Managers are responsible for communicating and implementing the Policy and ensuring that individuals feel able to raise concerns without fear of reprisals.

All employees are responsible for complying with the Policy and its procedures.

12.0 Anti-Facilitation of Tax Evasion

We take a zero-tolerance approach to the facilitation of tax evasion, whether under Irish law or under the law of any EU Member State.

Under **Part 2, Criminal Justice (Offences Relating to Revenue) Act 2010** and **Taxes Consolidation Act 1997**, it is a criminal offence to knowingly assist another person in the fraudulent evasion of tax. Corporate entities and partnerships may also be held liable for failing to prevent such facilitation.

It is not acceptable for any employee or representative to:

- Engage in any form of facilitating tax evasion or foreign tax evasion;
- Aid, abet, counsel or procure the commission of a tax evasion offence by another person;
- Fail to promptly report any request or demand to facilitate fraudulent tax evasion;
- Threaten or retaliate against anyone who refuses to participate in such acts or who raises genuine concerns.

All employees must report any suspicious behaviour to their line manager. Concerns raised in good faith will be supported under the **Protected Disclosures (Amendment) Act 2022**, which implements the **EU Whistleblower Directive (2019/1937)**.

13.0 Disciplinary Policy and Procedure

The Company's Disciplinary Policy ensures that all matters are dealt with fairly and consistently. Breaches of this Code may result in disciplinary action, up to and including dismissal, in accordance with Irish employment law.

14.0 Review of the Policy

This Policy will be reviewed annually and in light of operating experience and/or legislative changes, particularly with reference to Irish and EU law.



Signed

A handwritten signature in black ink, appearing to read 'P. Bruton', is written below the 'Signed' text.

Paddy Bruton

Managing Director

Date: 1st December 2025