

About this policy

- It is the policy of O'Brien Facilities Ltd 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 our business dealings and relationships.
- This policy is aligned with the Criminal Justice (Corruption Offences) Act 2018 and all other applicable Irish anti-corruption legislation.
- Any employee who breaches this policy will be subject to disciplinary action, which may result in dismissal for gross misconduct. Any non-employee who breaches this policy may have their contract terminated with immediate effect.
- This policy does not form part of any employee's contract of employment and may be amended at any time. It will be reviewed at least annually.
- Overall responsibility for implementing and monitoring this policy rests with the Director / Managing Director of O'Brien Facilities Ltd.

Who must comply with this policy?

- This policy applies to all persons working for, or on behalf of, O'Brien Facilities Ltd in any capacity. This includes employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, suppliers, and business partners.
- Contractors and suppliers may be required to confirm compliance with this policy as part of contractual or tender requirements.

What is bribery?

- A bribe is a financial or other inducement or reward for action that is illegal, unethical, a breach of trust, or otherwise improper. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, contracts, or any other advantage or benefit.
- Bribery includes offering, promising, giving, accepting, or seeking a bribe.
- All forms of bribery and corruption are strictly prohibited. If there is any uncertainty about whether an action constitutes bribery, this must be raised with a Managing Director or Director before proceeding.
- Specifically, you must not:
 1. give or offer any payment, gift, hospitality, or other benefit with the expectation that a business advantage will be received in return, or to reward business already obtained;
 2. accept any offer from a third party that you know or suspect is made with the expectation that O'Brien Facilities Ltd will provide a business advantage;
 3. give, offer, request, or accept any facilitation payment to a government official or any other party, regardless of local custom or practice.

- You must not threaten, victimise, or retaliate against anyone who refuses to offer or accept a bribe, or who raises a concern in good faith under this policy.

Gifts and hospitality


- Reasonable and proportionate gifts or hospitality may be given or accepted only where they are for legitimate business purposes, such as building professional relationships or maintaining the company's reputation.
- Gifts or hospitality must never be excessive, lavish, or capable of being interpreted as an inducement or reward for preferential treatment, particularly during procurement, tendering, or contractual negotiations.
- Gifts or hospitality must:
 - be of an appropriate type and value;
 - not include cash or cash equivalents (such as vouchers or prepaid cards), except where issued by the company as part of an approved employee reward, bonus, or recognition scheme;
 - not be given or received in secret;
 - be given in the name of O'Brien Facilities Ltd, not in an individual's personal name.
- Promotional items of low value, such as branded stationery or modest refreshments, may be given or accepted.
- Any gift or hospitality must receive prior approval from a Director.
- Gifts or hospitality not permitted under any circumstances, except where provided by O'Brien Facilities Ltd directly to its employees as part of an approved company-wide reward, bonus, or seasonal gift (for example, a Christmas gift card).

Record-keeping

- All gifts and hospitality given or received must be declared and recorded in the Gifts and Hospitality Register maintained by the company.
- All expense claims relating to gifts, hospitality, or payments to third parties must be submitted in accordance with the company's Expenses Policy and must clearly state the purpose of the expenditure.
- All accounts, invoices, and records relating to dealings with third parties must be accurate, complete, and transparent. No accounts may be kept off-book or used to conceal improper payments.
- Records relating to gifts, hospitality, and related financial transactions will be retained for a minimum of Seven years.

How to raise a concern

- If you are offered a bribe, asked to make one, or suspect that bribery or corruption has occurred or may occur, you must report this as soon as possible to your Managing Director or a Director.

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- Concerns may also be raised in accordance with the company’s whistleblowing policy (WP 01)

Whistleblowing Policy (WP 01).

- All reports will be treated confidentially, and no individual will suffer any form of retaliation or disadvantage for raising a genuine concern in good faith.

Awareness

- Compliance with this policy is a condition of working for, or on behalf of, O’Brien Facilities Ltd.
- This policy is circulated to all employees and any other personnel directly involved in this business.

Policy review

Annually or sooner if required by changes in legislation or business activities.

Signed:



Director: Aaron O’Brien

Date : 24-03-26.