

Code of Business Conduct & Ethics Code

Techrete's Business Conduct and Ethics Code is built on our core values and strategic drivers whilst highlighting the principles that guide our business conduct with good legal and ethical standards.

This policy and all reference to the Company and its employees herein apply to Techrete, its subsidiaries and employees. The primary objective is to protect the employees of the Company and our subsidiaries from conflict, litigation or criticism that might result from alleged or real conflicts of interest or unethical practices.

The essence of this policy in all these matters is that employees shall deal with suppliers, customers and other persons doing or seeking to do business with the Company and our subsidiaries in a manner that excludes considerations of personal advantage.

Ethical Decision Making

Sales of the Company's products and services, and purchases of products and services of suppliers shall be made based on quality, price, delivery and service and never on the basis of giving or receiving payments, gifts, entertainment or favours.

No Company funds or assets shall be used for any unlawful purpose. No employee shall purchase privileges or special benefits through payment of bribes, illegal political contributions, or other illicit payments. No undisclosed or unrecorded fund or asset shall be established for any purpose.

No false or artificial entries shall be made in the books and records of the Company for any reason, and no employee shall engage in any arrangement that results in such prohibited act, even if directed to do so by a Manager.

No payment shall be approved or made with the agreement or understanding that any part of such payment is to be used for any purpose other than that described by documents supporting the payment.



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No payments of any kind (whether commissions, promotional expenses, personal expenses, free goods or whatever) shall be made to an unaffiliated supplier or sub-contractor (or employee or agent thereof), unless:

- the transaction complies in all other respects with this Policy on Business Conduct, and
- the arrangements are set forth in a letter of understanding between our Company and the outside supplier or sub-contractor.

The Chairman and Executive Directors of our company have the primary responsibility to devise, establish and maintain an effective system of internal accounting controls, and to demonstrate that such controls are periodically appraised and documented.

Conflicts of Interest

Every employee has a duty to make all reasonable effort to avoid business, financial or other direct or indirect interests or relationships which conflict with the interests of the Company or which divide their loyalty to the Company. Any activity which even appears to present such a conflict must be avoided or terminated unless, after disclosure to the appropriate level of management, it is determined that the activity is not harmful to the Company or otherwise improper.

A conflict or the appearance of a conflict of interest may arise in many ways. For example, depending on the circumstances, the following may constitute an improper conflict of interest:

- Ownership of or an interest in a competitor or in a business with which the Company has or is contemplating a relationship (such as a supplier, contractor, etc.), either directly or such as through family members.
- Employees conducting business on behalf of the Company with a member of their family or a business organisation with which the employee or a member of the employee's family has an association which would be construed as significant in terms of a potential unless such business dealings have been



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disclosed in writing beforehand to the employee's Manager or the responsible level of management and a specific non objection has been given.

- Profiting, or assisting others to profit, from confidential information or business opportunities that are available because of employment by the Company.
- Providing services to a competitor or a proposed or present supplier or customer as an employee, director, officer, partner, agent or consultant.
- Accepting an offer to serve as a director, partner, consultant, or in a managerial position with, or to be employed in a technical capacity by a non be obtained. stating a specific euro/sterling amount, com length terms and free o employees. indirectly conflict of interest, affiliated business organisation which does a significant business with, or is a competitor of the Company, without advising their manager of such plans before starting the activity. Where the potential for conflict of interest exists, prior specific approval of the employee's Manager or the responsible management level should be obtained.
- Soliciting or accepting gifts, payments, loans, services or any form of compensation from suppliers, customers, competitors or others seeking to do business with the Company. Social amenities customarily associated with legitimate business relationships are permissible. These include the usual forms of entertainment such as lunches or dinners as well as occasional gifts of nominal or token value. While it is difficult to define "customary," "token," or "usual" by stating specific euro/sterling amount, common sense should dictate what would be considered extravagant or excessive. If a disinterested third party would be likely to infer that it affected your judgement, then it is too much. All of our business dealings must be on arm's f any favourable treatment resulting from the personal interest of our employees.
- It is never permissible to accept a gift in cash or cash equivalents (e.g., stocks or other forms of marketable securities) of any amount.
- Influencing or attempting to influence any business transaction between the Company and another entity in which an employee has a direct or indirect financial interest or acts as a director, officer, employee, partner, agent or consultant.



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Employees should always disclose an activity if they are in doubt about whether it represents a conflict of interest.

Disclosure is Key

Any employee who has a question about any situation in which he or she is involved should disclose the pertinent details, preferably in writing, to their Manager. Each Manager is responsible for discussing the situation with the employee and arriving at a decision after consultation with or notice to the appropriate higher level of management. Each manager is responsible for advising the Chairman and Executive Directors, in writing, of all disclosures and decisions made under this Policy.

To summarise, each employee is obligated to disclose their own conflict or any appearance of a conflict of interest. The end result of the process of disclosure, discussion and consultation may well be approval of certain relationships or transactions on the grounds that, despite appearances, they are not harmful to the Company. But all conflicts and appearances of conflicts of interest are prohibited, even if they do not harm the Company, unless they have gone through this process.

Employees shall not, without proper authority, give or release to anyone not employed by the Company or a subsidiary, or to another employee who has no need for the information, data or information of a confidential nature concerning the Company or subsidiary. For example, disclosure of financial information can be harmful to the Company and could be the basis for serious legal complications to the individual as well as the Company.

Respect for Trade Secrets

It is the policy of Techrete to respect the trade secrets and proprietary information of others. Although information obtained from the public domain is a legitimate source of competitive information, a trade secret obtained through improper means is not.

If a competitor's trade secrets or proprietary information are offered to you in a suspicious manner, or if you have any question about the legitimacy of competitive



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information that is made available to you, you should contact your Manager immediately. No action regarding such materials should be taken before consultation with the Chairman or Executive Directors.

Compliance with Laws and Regulations

It is the policy of Techrete to comply with the laws of each country in which we do business. It is the responsibility of all management and employees to be familiar with the laws and regulations which relate to their business responsibilities and to comply with them.

Set forth below are several areas of regulated business activity that require particular attention.

1. **Workplace Safety Laws and Regulations:** In the interest of maintaining a safe and healthy workplace, the Company requires full compliance with applicable workplace safety and industrial standards mandated by law.
2. **Environmental Laws and Regulations:** Techrete is committed to conducting its business in an environmentally sound manner. Management and employees are required to be familiar with environmental laws and regulations which relate to their employment responsibilities and to comply with them. This includes ensuring that reports on environmental matters filed with government agencies or required by law to be published are complete and accurate.
3. **Modern Day Slavery Laws:** Pursuant to Section 54(1) of the Modern Slavery Act 2015, Techrete is committed to ensuring modern slavery or human trafficking is not taking place within our business or supply chain and has a zero-tolerance approach to modern slavery in all forms.

Responsibilities of Managers and Employees

All managers shall be responsible for the enforcement of and compliance with this Policy on Business Conduct including necessary distribution to ensure employee knowledge and compliance. Appropriate managers will periodically be required to



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certify compliance with this Policy. Any false certification – even if directed by a manager – will be dealt with severely.

Reporting of Violations

All employees are responsible for complying with this Policy. Any employee having information concerning any prohibited or unlawful act shall promptly report such matter to the appropriate management level within Techrete. While this is the preferred reporting procedure, employees should also feel free to report to anyone in management, including the Executive Directors, or Chairman of Techrete.

Employees should be advised of this reporting obligation and encouraged to report any prohibited or unlawful activities of which they are aware. There will be no reprisals for reporting such information and employees should be aware that our Protected Disclosures Policy will be applied in such circumstances.

Governance

The Executive Directors will assist in monitoring compliance with this Policy. The external auditors will also be particularly alert and sensitive to such compliance. All employees are expected to provide full assistance and disclosure to both the internal and external auditors, in connection with any review of compliance with this Policy.

Non-Retaliation

Techrete does not tolerate any form of retaliation for reports made in good faith. This includes blatant actions, such as termination, transferring, demoting or publicly commenting on an someone, as well as more subtle retaliation, such as avoiding someone, leaving him or her out of professional or social activities and so on. It includes actions taken by managers and employees alike.



Aidan Williamson
Chief Executive Officer

Date: 16.06.26



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Corporate Social Responsibility (CSR) & Local Community Involvement Policy

Introduction

At Techrete, Corporate Social Responsibility (CSR) we are committed to conducting business responsibly, ethically and sustainably while actively contributing to our local communities in which we operate. This policy reflects our dedication to making a proactive social and environmental impact.

We believe that strong communities are the foundation of long-term business success, and we strive to support local initiatives and foster meaningful partnerships. Through this policy, we aim to integrate responsible business practices with proactive community engagement, ensuring that our growth benefits both society and the environment.

A demonstration of our commitment to community engagement in the UK and Ireland is the annual sponsoring of local football teams – Brigg FC senior ladies' team and Balbriggan FC senior men's team, as well as supporting numerous local fundraisers throughout the year.

We engage with colleges that are local to our construction sites and actively seek out local apprentices, which often results in full time employment. We actively seek out third-level education students for work experience at our offices through attending college fairs, such as the Trinity College Engineering fair.

Techrete's Values & Strategic Drivers

We are actively committed to the five pillars of CSR – Community engagement, marketplace, workplace, governance and environment and have aligned these pillars with our strategic drivers that we have embedded into the culture of our workplace.





These groups include, but are not limited to employees, suppliers, local communities and government regulators. We have committed to the integration of socially responsible values and the concerns of key stakeholders into our operations in a manner that fulfils and exceeds current legal and commercial expectations.

Our approach to CSR includes, but is not limited to, ethical business practices, respect for human rights, environmental sustainability, commitment to the law, healthy work environment and decreasing carbon footprint.

We are acutely aware of the challenges facing the work in respect to climate change and as such, we have aligned our sustainability targets to the UNSDG's. This underpins the ambition of our strategy to reach net zero by 2030. We also have a clear strategy for the embodied carbon reduction of our precast concrete panels, which aligns with the very latest guidance from the IStructE, ICE, Concrete Zero & the MPA.

Communication

Corporate Social Responsibility for Techrete is about recognising and addressing the needs of all groups that are affected by the activities of our organisation. We





understand the importance of engaging with, and supporting our local communities and this engagement connects our people to the local communities, while maintaining our corporate culture of 'giving back'.

We develop trust and ownership through engaging with our communities in an honest, transparent and responsive manner while understanding the local context and tapping into local knowledge, skills and resources. We have openly consulted and informed our local residents of developments at our factories from the outset, at the design stage and during the construction and their comments and concerns have always been taken into consideration.

Status of this policy

The company reserves the right to alter any of its terms at any time although we will notify you in writing of any changes.

We will review this policy at regular intervals, monitor its effectiveness and implement any changes that may be required.



Aidan Williamson
Chief Executive Officer

Date: 16.06.26



Dignity at Work and Anti-Bullying and Harassment Policy

This policy applies to Ireland locations only and is applicable to all employees irrespective of length of service and includes clients and service personnel.

Techrete's Approach

At Techrete we are committed to a culture of equality, diversity, and inclusion, supporting the wellbeing of our people through a safe, respectful, and inclusive workplace. As part of the company's code of conduct, it is imperative that all staff and clients respect the dignity of every colleague. Please consider the multi-cultural beliefs of all your colleagues with reference to remarks, dress code, posters, e-mails and anything which may cause offence to a person based on their gender, civil status, race, religion, family status, age, sexual orientation, membership of the Traveller community or disability. Please be aware that bullying and harassment is not solely confined to these areas.

Reflecting our Company value, **We are a Team** and our Strategic Driver to **Be a Great Place to Work**, we strive to create an environment free from harassment, where everyone is treated with dignity and respect.

Additionally, in line with our **Be Safe** Strategic Driver, we are embedding a culture of safety and wellbeing across our organisation. This means driving the right behaviours, fostering mutual respect and ensuring every individual contributes to a safe, inclusive and healthy workplace. Our goal is to send everyone home safe every day, physically and mentally.

We have a zero-tolerance approach to bullying and harassment and are committed to ensuring that all members of staff are treated, and treat others, with dignity and respect. This commitment is not only about compliance, but about living our values every day and creating a workplace where everyone can succeed together.



The company acknowledges the right of all employees to a workplace and environment free from any form of harassment or bullying. Every employee has an obligation to be aware of the effects of their own behaviour on others. Techrete's policy adheres to the Code of Practice for Employers and Employees on the prevention and Resolution of Bullying at work.

Any instances of bullying or harassment will be dealt with in an effective and efficient manner. In cases where the behaviour is proved to be consistent, causing unnecessary stress and anxiety, this may be considered gross misconduct. The company reserves the right to use the disciplinary procedure up to and including dismissal.

In addition, we will not tolerate any retaliation against, or victimisation of, any person who has been involved in bringing a complaint of harassment or bullying. Retaliation against or victimisation of a person who has made a complaint of bullying or harassment will constitute a disciplinary offence, which may in appropriate circumstances lead to dismissal. We will treat all allegations seriously and will deal with them in accordance with this policy.

The aim of this policy is to highlight examples of bullying and harassment and what action the company will take if they need to deal with an offence of this nature.

Definitions

Bullying in the workplace is "repeated inappropriate behaviour, direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others, at the place of work /in the course of employment which could be reasonably regarded as undermining the employees' right to dignity at work". An isolated incident of the behaviour described in this definition may be an affront to dignity at work but a once off incident is not considered to be bullying. Bullying can include conduct that is considered offensive to a reasonable person, which may consist of verbal or written slurs, physical contact, gestures or jokes.

Bullying can involve the display of pictures, magazines, flags, graffiti or other materials that could state or imply prejudicial attitudes, or which are offensive to others. Bullying at work does not include reasonable and essential discipline arising from the good



management of the performance of an employee at work or actions taken which can be justified as regards the safety, health and welfare of the employees. According to the Code of Practice for Employers and Employees on the Prevention and Resolution of Bullying at Work some examples of behaviour, which makes for a bullying pattern will likely include not just one but a range of the following behaviours:

- Exclusion with negative consequences,
- Verbal abuse/insults,
- Being treated less favourably than colleagues in similar roles,
- Belittling a person's opinion,
- Disseminating malicious rumours, gossip or innuendo,
- Socially excluding or isolating a person within the work sphere,
- Intrusion – pestering, spying or stalking or stalking intimidation/ aggressive interactions,
- Excessive monitoring of work,
- Withholding information necessary for proper performance of a person's job,
- Repeatedly manipulation a person's job content and targets,
- Blaming a person for things beyond their control beyond their control,
- Use of aggressive and obscene language,
- Other menacing behaviour.

Bullying does not include: (Non-exhaustive list)

- Expressing differences of opinion strongly,
- Offering constructive feedback, guidance or advice about work-related behaviour, which is not of itself welcome,
- Ordinary performance management,
- Reasonable corrective action taken by an employer or manager relating to the management and direction of employees (for example managing a worker's performance, taking reasonable disciplinary actions, or assigning work)
- Workplace conflict where people disagree with or disregard the others' point of view.



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Harassment/sexual harassment for the purposes of the Employment Equality Acts is any unwanted conduct related to any of the discriminatory grounds under the Employment Equality Acts. Harassment in the workplace is any act or conduct including spoken words, gestures or the production, display or circulation of written words, pictures or other material if the action or conduct is unwelcoming to the employee and could be reasonably be regarded as offensive, humiliating or intimidating. Sexual harassment is any unwanted or uninvited sexual conduct which is unwelcome and could reasonably be regarded as sexually offensive, humiliating or intimidating.

Discrimination in the workplace is prohibited on any of the following 9 grounds - Gender, Civil status, Family status, Sexual orientation, Religion, Age, Disability, Race or Membership of the Traveller Community.

Addressing Concerns

In handling cases of bullying and harassment in the workplace, Techrete adheres to the Code of Practice for Employers and Employees on the prevention and Resolution of Bullying at work.

- The initial informal response,
- The secondary Informal process and
- The formal procedure.

It is the policy of Techrete to solve issues of this nature at the informal stage whenever possible and practical and, in any event, to ensure they are dealt with effectively, sensitively, confidentially and as promptly as possible. Where an employee feels unsure whether they have been subject to inappropriate behaviour such as bullying, harassment or sexual harassment, they may wish to discuss the matter confidentially with their manager, or a company designated Contact Person to assess their options. Please Note: all parties are entitled to be accompanied by a union representative or work colleague in the meetings referred to in this section.

The Initial Informal Response



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This response is suitable for non-serious complaints, such as in scenarios, where it is likely the accused is not even aware of his/her behaviour negatively impacting others. It is a very informal mechanism that should be designed to be flexible in order to allow for minor complaints to be quickly dealt with.

Ideally, this initial informal response would effectively address the unwanted behaviour without any recourse to any other action. It is preferable for all concerned that complaints of bullying or harassment are dealt with informally whenever possible. This is likely to produce solutions that are speedy, effective and conducive to a positive working environment. Thus, in the first instance a person who believes that he or she is the subject of bullying/harassment should ask the person(s) responsible to stop the offensive behaviour. A person may seek help and advice on a confidential basis from a designated contact person, particularly where a person finds it difficult to approach the alleged perpetrator(s) directly. The role of the designated contact person is not to judge but rather to provide advice and assistance about the organisation's policy and options to resolve a concern.

Having consulted with the contact person, the complainant may request the assistance of a manager in raising the issue with the alleged perpetrator(s). In this situation the approach of the manager should be by way of a confidential, non-confrontational discussion with a view to resolving the issue in an informal, low-key manner.

Secondary Informal Process

A complainant may wish to invoke this process if the above is not suitable or is unable to deal with the complaint. This process is more protracted than the initial response but still informal. A designated employee with training in the management of complaints will be assigned to handle the complaint on behalf of the organisation. This will be someone with authority within the organisation.

It is recommended that the employee submits the complaint in writing, but where this does not occur, the designated person handling the complaint will write up the complaint and provide the complainant with a copy. The designated person will then attempt to establish the facts and context of the complaint before deciding on the



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next actions to be taken. (It should be noted that if no concrete examples of inappropriate behaviour are given by the complainant, the accused will have no recourse to repudiating any accusation that is not specific and therefore the complaint will fail)

If, however, after the designated employee has established the facts, they believe the accused has a case to answer, they will put the allegation against him/her in writing and allow them the chance to respond. A meeting will be organised with the accused to record his/her response.

Thereafter a method should be agreed to progress the issue to resolution so that both parties can return to a harmonious working environment whilst the process continues.

If it is found that there has been inappropriate behaviour from the accused, steps should be put in place to stop the behaviour and to monitor it going forward to prevent a reoccurrence. This should include the drawing up of a plan with agreed actions which is to be signed by both parties at the final meeting. The designated employee handling the case should keep a nominal record of all stages and ensure these are kept in line with GDPR.

Whilst it is always recommended that employees exhaust the initial informal response before escalating the complaint, it is recognised that it may not always be suitable and that a complainant may decide, for whatever reason, to bypass the initial informal response mechanism. Choosing not to use the initial informal response will not reflect negatively on a complainant in the secondary informal process or the formal procedure.

The Formal Procedure

In the event that the initial informal process, the secondary informal process and mediation fail, and the harassment is repeated, or where the employee chooses to bypass the informal procedures or mediation, the employee may opt to progress to the formal procedure. The company may also deem it appropriate to progress directly to the formal procedure. The employee should make a formal complaint in writing that should be signed and dated, to his/her immediate manager, or if preferred, any



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member of the management team. Where this is not possible, a written record should be taken of the complaint by the assigned person and signed by the complainant and dated. The complaint should be confined to precise details of alleged incidents of bullying, including their dates, and names of witnesses, where possible. These are the steps that individuals must follow in this procedure:

Make your initial complaint in writing, signed and dated to your Manager. If your line manager is involved in the incident, make the complaint to the next manager in succession i.e. your line manager's manager.

- All complaints will be treated in the strictest confidence
- Only individuals necessary to the investigation will be involved from the initial stages
- The alleged perpetrator(s) will be notified in writing that an allegation of bullying and or harassment has been made against him/her. He or she will be given a copy of the complainant's statement and advised that he/she shall be afforded a fair opportunity to respond to the allegation. The complaint should be confined to precise details of actual incidents of bullying or harassment.
- A manager will be assigned to investigate the complaint. This will be decided by the company. The company is committed to dealing with every case in a timely and objective manner.

Investigation

The investigation will be conducted by either a designated member(s) of management, or if deemed appropriate, an agreed third party and will be governed by terms of reference including:

- That the investigation will be conducted in accordance with the Anti Bullying Policy.
- An indicative timescale for its completion will be provided.
- The scope of the investigation will be outlined.
- Confidentiality will be upheld at all times.



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The investigator will meet with the employee, the alleged perpetrator(s) and any witnesses or relevant persons with a view to establishing the facts surrounding the allegation(s). Where necessary, parties to the investigation may in some cases be suspended with pay during the investigation of the complaint. When all the facts have been collected the alleged perpetrator will have the opportunity to explore the allegation(s) made against him/her in an investigatory meeting. He/she will have details of the case read out to them and has the right to respond to his/her case. Techrete reserves the right to vary the above process depending on the nature of the complaint/investigation.

Outcome

The employee and the alleged perpetrator(s) will be informed in writing of the findings of the investigation. Should the investigation team decide that the complaint is well founded; the alleged perpetrator(s) will be invited to a formal meeting to confirm an appropriate course of action. Such action could, for example, involve counselling and or monitoring or progressing the issue through disciplinary action up to and including dismissal. If either party is unhappy with the outcome of the investigation, the issue may be appealed internally within five working days of the date of the outcome letter. You will then be notified of the manager who will hear this appeal.

The company reserves the right to relocate either party, where it is necessary for the effective running of the operation, both during or after the investigation. Mediation may also be offered to facilitate the parties in working together, going forward. In cases where it is discovered that the victim made a false/malicious or vexatious accusation of bullying/harassment, an employee may face an investigation which may result in disciplinary action up to and including dismissal.

Breaches of the Dignity at Work Policy

Discrimination, bullying and harassment will not be tolerated at Techrete. Breaches of the Company's equal opportunities and dignity at work policy will be regarded as misconduct and may be subject to disciplinary action under the disciplinary procedure. In addition, should employees feel that they have not been treated fairly with regard to employment equality, they may utilise the grievance procedure.



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Prevention Steps

We will take proactive steps to prevent all forms of harassment and bullying of our people, including by third parties (for example our customers, self-employed contractors, suppliers, or visitors to our premises). Non-exhaustive examples of measures we are committed to taking include:

- Ensuring that all of new starters attend training on equality, diversity and inclusion issues, including anti-harassment and anti-bullying training, as part of the on-boarding process;
- Ensuring all employees are regularly informed about equality, diversity, and inclusion matters, including awareness of anti-harassment and anti-bullying policies;
- Providing focused training for line managers so that they understand how to implement this policy effectively and their role in preventing and stopping bullying and harassment from occurring in the workplace (including by third parties);
- Regularly checking for risks and taking steps to help minimise the risk of exposure to sexual harassment, including by third parties;
- Monitoring our organisational culture via measures such as exit interviews, return-to-work meetings, Human Resources open door commitment and Manager feedback. We will take active steps to address any issues that are identified as part of our process of ongoing monitoring and review;
- Ensuring that our zero-tolerance approach to all forms of bullying and harassment, is effectively communicated, including to third parties with whom our staff come into contact.

Contact person

Where you are subjected to inappropriate behaviours, or where you are accused of perpetrating same, you may wish to talk with one of the company's designated Contact Persons. The role of the Contact Person is primarily to listen to you while you outline what has happened / is happening, help you fully understand the company's



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Dignity at Work policy and, therefore, enable you to assess your preferred option(s) and/or course of action. The conversation is confidential and non-directive – they will not offer advice or tell you what to do. If you wish to speak with a contact person, please contact Human Resources.

Further Support

We understand that anyone affected by, or involved with, a complaint of bullying or harassment may feel anxious or upset and we will do what we can to provide appropriate support. Confidential counselling is available via our employee assistance programme for anyone affected by, or accused of, bullying or harassment. This is a free and confidential service, which you can avail of. Contact details can be found on company noticeboards, intranet, or obtained from our Mental Health First Aiders, Human Resources team, or Management.

Monitoring

The Company's dignity at work policy will be reviewed on a regular basis to assess the effectiveness of its implementation and operation in creating a truly integrated workplace.



Aidan Williamson
Chief Executive Officer

Date: 16.06.26



Dignity at Work and Anti-Bullying and Harassment Policy (UK)

This policy applies to UK locations only and covers all employees, apprentices, job applicants, volunteers and interns. It also applies to any individual or organisation engaged by Techrete, including but not limited to agency workers, contractors and partners in business.

Techrete's Approach

At Techrete we are committed to a culture of equality, diversity, and inclusion, supporting the wellbeing of our people through a safe, respectful, and inclusive workplace. As part of the company's code of conduct, it is imperative that all staff and clients respect the dignity of every colleague. Please consider the multi-cultural beliefs of all your colleagues with reference to remarks, dress code, posters, e-mails and anything which may cause offence to a person based on their gender, civil status, race, religion, family status, age, sexual orientation, membership of the Traveller community or disability. Please be aware that bullying and harassment is not solely confined to these areas.

Reflecting our Company value, **We are a Team** and our Strategic Driver to **Be a Great Place to Work**, we strive to create an environment free from harassment, where everyone is treated with dignity and respect. Additionally, in line with our **Be Safe** Strategic Driver, we are embedding a culture of safety and wellbeing across our organisation. This means driving the right behaviours, fostering mutual respect and ensuring every individual contributes to a safe, inclusive and healthy workplace. Our goal is to send everyone home safe every day, physically and mentally.

We have a zero-tolerance approach to bullying and harassment and are committed to ensuring that all members of staff are treated, and treat others, with dignity and respect. This commitment is not only about compliance, but about living our values every day and creating a workplace where everyone can succeed together.



The company acknowledges the right of all employees to a workplace and environment free from any form of harassment or bullying. Every employee has an obligation to be aware of the effects of their own behaviour on others. Techrete's policy adheres to the Code of Practice for Employers and Employees on the prevention and Resolution of Bullying at work.

Any instances of bullying or harassment will be dealt with in an effective and efficient manner. In cases where the behaviour is proved to be consistent, causing unnecessary stress and anxiety, this may be considered gross misconduct. The company reserves the right to use the disciplinary procedure up to and including dismissal.

In addition, we will not tolerate any retaliation against, or victimisation of, any person who has been involved in bringing a complaint of harassment or bullying. Retaliation against or victimisation of a person who has made a complaint of bullying or harassment will constitute a disciplinary offence, which may in appropriate circumstances lead to dismissal. We will treat all allegations seriously and will deal with them in accordance with this policy.

What Kind of Treatment Amounts to Harassment?

"Harassment" is any unwanted physical, verbal or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment for that person.

Harassment may involve conduct of a sexual nature (sexual harassment), or it may be related to another protected characteristic such as age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex, or sexual orientation. Our stance is that harassment is unacceptable even if it does not fall within any of these categories.

Harassment also includes situations where someone is treated less favourably because they have submitted to or refused to submit to such harassing behaviour in the past.



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Harassment can take many forms. Non-exhaustive examples of harassment include:

- Verbal abuse, “banter”, offensive comments, jokes, taunts or pranks, whether or not related to a protected characteristic;
- Unwanted physical conduct, intimidation or “horseplay” (such as touching, pinching, grabbing, hitting, pushing, or jostling);
- Unwelcome sexual advances or suggestive behaviour (even if the harasser perceives the conduct as harmless, or the conduct has not been unwelcomed in the past);
- Lewd or suggestive comments or gestures, including offensive comments or gestures about appearance or dress, innuendo, leering and whistling;
- Sending or displaying material by any means that is pornographic, inflammatory, abusive, or that some people might find offensive (including “pin-ups”, graffiti, emails, text messages, video clips and/or images sent electronically or posted online);
- Suggestions or threats by managers or supervisors that sexual favours or racial origins could affect someone’s job security or prospects;
- Excluding or making derogatory comments about someone because of a perceived protected characteristic, or because they are associated with someone with a protected characteristic.

A single incident can amount to harassment. It is the impact of the conduct and not the intent of the action that determines whether harassment has taken place. A person may be harassed even if they were not the intended target. For example, a person may be harassed by racist jokes about a different ethnic group if the jokes create an offensive environment.

What Kind of Treatment Amounts to Bullying?

There is no legal definition of bullying. However, we regard “bullying” to be behaviour (aimed at an individual or group of individuals) which creates a threatening,



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intimidating or humiliating environment that undermines the confidence and self-esteem of the recipient. In some cases, the bully misuses the power they hold from being in a position of authority; other times the power may be the bully's personal strength or the power to coerce through fear or intimidation.

Bullying conduct may be physical, verbal and/or non-verbal. Non-exhaustive examples of bullying include:

- physical or psychological threats;
- verbal abuse, such as shouting or swearing at colleagues;
- practical jokes, initiation ceremonies, or inappropriate birthday rituals;
- supervision which is overbearing or intimidating;
- deliberate exclusion from work activities or conversations at work;
- cyberbullying, i.e. using information and communications technology (particularly mobile phones, the internet and social media) to upset or humiliate someone.

The following do not, of themselves, amount to bullying: appropriate criticism of an employee's behaviour; proper performance management; reasonable instructions given to staff in the course of their employment. If the bullying relates to a person's protected characteristic, it may also constitute harassment and as such will be unlawful. It is important to recognise that conduct which one person may find acceptable, another may find unacceptable. We expect all staff to be treated with due respect and appropriate sensitivity.

Addressing Concerns

We will take proactive steps to prevent all forms of harassment and bullying of our people, including by third parties (for example our customers, self-employed contractors, suppliers, or visitors to our premises). Non-exhaustive examples of measures we are committed to taking include:

- Ensuring that all of new starters attend training on equality, diversity and inclusion issues, including anti-harassment and anti-bullying training, as part of the on-boarding process;



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- Ensuring all employees are regularly informed about equality, diversity, and inclusion matters, including awareness of anti-harassment and anti-bullying policies;
- Providing focused training for line managers so that they understand how to implement this policy effectively and their role in preventing and stopping bullying and harassment from occurring in the workplace (including by third parties);
- Regularly checking for risks and taking steps to help minimise the risk of exposure to sexual harassment, including by third parties;
- Monitoring our organisational culture via measures such as exit interviews, return-to-work meetings, Human Resources open door commitment and Manager feedback.
- We will take active steps to address any issues that are identified as part of our process of ongoing monitoring and review;
- Ensuring that our zero-tolerance approach to all forms of bullying and harassment, is effectively communicated, including to third parties with whom our staff come into contact.

We will take appropriate action in relation to any allegations of harassment or bullying, including by third parties. We will treat all allegations seriously, irrespective of the seniority of the alleged perpetrator, whether the conduct is a one-off act or a repeated course of conduct, and whether it appears the conduct was undertaken deliberately or not. If you experience bullying or harassment, we encourage you to speak up without delay and to ask for appropriate support.

We will investigate any allegations in a timely manner, sensitively and, as far as possible, confidentially. Where, following investigation, the evidence indicates that this policy has been breached, we will usually take action under our disciplinary procedure (which could result in a disciplinary sanction up to and including dismissal). There is no justifiable reason to bully or harass someone else. You should also be aware that if a court or tribunal finds that you have bullied or harassed someone you could be personally liable to compensate the victim. In some circumstances the treatment may also amount to a crime punishable by a fine or imprisonment.



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False accusations of harassment or bullying can have a serious effect on innocent individuals. Accordingly, false allegations or actions which are made in bad faith will be dealt with under our disciplinary procedure. Individuals who make allegations of bullying or harassment in good faith will not be treated less favourably as a result.

If you are being harassed or bullied by another member of staff, you may wish to start by trying to resolve the issue informally. You may be able to resolve the situation yourself by explaining clearly to the perpetrator(s) that their behaviour is not welcome or makes you uncomfortable, that you consider it to be contrary to our policy and that it must stop.

If speaking to the individual(s) does not feel appropriate or if such action is taken but is unsuccessful in addressing the concern, you could speak with your manager or another colleague to seek guidance on how best to resolve the issue. Your request for help will be treated confidentially. If the above approach does not work or if you do not want to try to resolve the situation in this way, or if you are being bullied by your own manager, you should raise the issue with the Human Resources Department.

They may try to resolve the situation informally by telling the alleged perpetrator(s), without prejudging the matter, that: there has been a complaint that their behaviour is having an adverse effect on a fellow employee; such behaviour is contrary to our policy; and the continuation of such behaviour could amount to a serious disciplinary offence. It may be possible to have this conversation with the alleged perpetrator without revealing your name, if this is what you want. They will also stress that the conversation is confidential.

In serious cases or where a colleague feels it necessary to take formal action immediately, a formal letter of complaint can be issued to the Company. The colleague and the Company should regard such complaint as a Grievance and should follow the requirements of the Company Grievance Policy in this regard. In certain circumstances we may be able to involve a neutral third party (a mediator) to facilitate a resolution of the problem.



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Your Rights and Responsibilities

You have the right not to experience bullying or harassment at work and to be treated with dignity and respect. You have a responsibility to comply with this policy and to help us to implement it.

You have a duty not to bully or harass anyone at work (including third parties with whom you come into contact at work) and not to help anyone else do so. You also have a duty to treat others with dignity and respect.

Further Support

We understand that anyone affected by, or involved with, a complaint of bullying or harassment may feel anxious or upset and we will do what we can to provide appropriate support.

Confidential counselling is available via our employee assistance programme for anyone affected by, or accused of, bullying or harassment. This is a free and confidential service, which you can avail of. Contact details can be found on company notice boards, intranet, or obtained from our Mental Health First Aiders, Human Resources team, or Management.

Data Protection

We aim to deal with complaints of bullying and harassment sensitively and with due respect for the privacy of the individuals involved. All employees must treat as confidential any information communicated to them in connection with a complaint under this procedure.

For information about our processing of personal data under this policy, including details of our legal grounds for doing so, how long we retain such personal data, who your personal data is shared with, your rights under data protection law and who you should contact if you have any concerns, please see our employee privacy notice, which is available on the company intranet.



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Statement

We recognise that we have a proactive duty to take reasonable steps to minimise the risks of sexual harassment of our workers and we take this duty seriously. We will undertake risk assessments, which we will keep under regular review, to assess the risk of our workers being exposed to sexual harassment at work, including steps we can take to minimise those risks and prevent sexual harassment from taking place (including with respect to third parties). We will take active measures to protect our workers from sexual harassment, in accordance with the risks identified in our risk assessment.



Aidan Williamson
Chief Executive Officer

Date: 16.06.26



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Equal Opportunities Statement (Ireland)

This statement applies to Ireland locations only.

Techrete is committed to promoting equality, diversity, and inclusion in all aspects of our work. Our goal is to create a workplace that reflects the diverse communities we serve and where everyone feels respected, valued, and empowered to achieve their full potential.

We oppose all forms of unlawful discrimination, whether in employment or in the provision of goods, services, and facilities. We are dedicated to ensuring fairness and respect for all, regardless of background or personal characteristics.

We comply with the Employment Equality Acts 1998–2015, which prohibit discrimination on grounds including gender, civil status, family status, sexual orientation, religion, age, disability, race, and membership of the Traveller community.

We are committed to:

- Opposing and avoiding all forms of unlawful discrimination, including pay and benefits, terms and conditions of employment, dealing with grievances and discipline, dismissal, redundancy, leave for parents, requests for flexible working, selection for employment, promotion, training or other development opportunities.
- Fostering an inclusive environment free from bullying, harassment, and victimisation.
- Ensuring equal access to opportunities for training, development, and career progression.
- Making employment decisions based on merit and capability.
- Providing training and guidance to all staff on their responsibilities under this commitment.
- Taking all complaints of discrimination or harassment seriously and addressing them through the organisation's grievance, disciplinary or any other appropriate





- procedures, and any necessary action will be taken. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice.
- Regularly reviewing our practices to ensure they remain fair, effective, and aligned with current legislation.

This statement is fully supported by senior management and reflects our ongoing commitment to equality, diversity, and inclusion in everything we do.



Aidan Williamson
Chief Executive Officer

Date: 16.06.26



Equal Opportunities Statement (UK)

This statement applies to UK locations only.

Techrete is committed to promoting equality, diversity, and inclusion in all aspects of our work. Our goal is to create a workplace that reflects the diverse communities we serve and where everyone feels respected, valued, and empowered to achieve their full potential.

We oppose all forms of unlawful discrimination, whether in employment or in the provision of goods, services, and facilities. We are dedicated to ensuring fairness and respect for all, regardless of background or personal characteristics.

We uphold the principles of the Equality Act 2010, protecting against discrimination based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

We are committed to:

- Opposing and avoiding all forms of unlawful discrimination, including pay and benefits, terms and conditions of employment, dealing with grievances and discipline, dismissal, redundancy, leave for parents, requests for flexible working, selection for employment, promotion, training or other development opportunities.
- Fostering an inclusive environment free from bullying, harassment, and victimisation.
- Ensuring equal access to opportunities for training, development, and career progression.
- Making employment decisions based on merit and capability.

- Providing training and guidance to all staff on their responsibilities under this commitment.
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Modern Slavery Statement

This statement for financial year 2025/2026 is made pursuant to the Modern Slavery Act 2015 and sets out the steps that Techrete has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery is an unquestionable and indefensible violation of an individual's basic human right. Techrete recognises that it has a moral and social responsibility to take a zero-tolerance approach to modern slavery in all forms.

Our Business

Techrete Design, Manufacture and Erect Architectural Precast Concrete Cladding. We have our head office and a production plant in Balbriggan in Ireland, a production plant in Brigg, North Lincolnshire and offices in Leicester and London. We operate in the manufacturing and construction sectors throughout the UK and Ireland.

Risk Management

Techrete undertake due diligence when considering taking on new employees, new suppliers and are in the process of reviewing our existing suppliers.

- We conduct internal discussion with commercial and purchasing managers to identify any possible high-risk areas.
- Questionnaires issued to suppliers / subcontractors now include questions relating to the Modern Slavery Act 2015.

Supply Chain Procurement

Techrete considers that we, and the majority of our suppliers, are not in industries with a high risk of modern-day slavery. In addition, our supply chains are primarily confined to Ireland and the UK, countries with a relatively lower risk of modern-day slavery and human trafficking. In this context, we expect our suppliers to comply with best practice in tackling modern slavery and human trafficking.



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Training

To ensure a high level of understanding of the risks of modern slavery and ensure human trafficking is not taking place in any part of our business or supply chains, the company requires all employees working in the supply chain management and relevant roles to complete training:

- On how to assess the risk of slavery and human trafficking in relations to various aspects of the business.
- How employees can identify the signs of slavery and human trafficking.
- What should be done if they suspect that it is taking place within our supply chain.

Internal Policies

This Policy Statement is supported by our internal policies which assist in ensuring that we conduct our business in an ethical and transparent manner, allowing effective controls and effective systems to safeguard against human trafficking and modern-day slavery within Techrete or any of our supply chain. These policies include:

- Protected Disclosures Policy: Our protected disclosure policy is intended to encourage and enable workers to raise concerns within Techrete, rather than overlooking a problem. Under this policy, an employee is entitled to raise concerns or disclose information without fear of penalisation or threat of less favourable treatment, discrimination or disadvantage.
- Equal Opportunities & Dignity at Work Policy: We are fully committed to ensuring that equal opportunities policies are implemented and maintained. All terms and conditions of service apply on a fair and consistent basis to every member of staff.
- Recruitment Policy: We operate a robust recruitment policy, including conducting checks on work eligibility for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- Code of Business Conduct: This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.



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- Corporate Social Responsibility Policy: Techrete has long practiced, strong corporate governance guidelines and we continue to advocate corporate responsibility in every facet of our business daily.

Our Performance Indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- Techrete continue to mitigate the risk of slavery & human trafficking occurring in our supply chain.
- Audits or online searches do not show evidence of modern slavery practices.
- The use of labour monitoring and payroll systems.
- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

This statement has been approved by the board of directors and constitutes our group’s slavery and human trafficking statement for the current financial year. This statement will be reviewed annually.



Aidan Williamson
Chief Executive Officer

Date: 16.06.26



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