

The following sets forth a restatement of the longstanding Techrete policy to conduct our affairs in accordance 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.

As you read the policies, keep in mind that their objective is to protect the employees of the Company and our subsidiaries from criticism or litigation that might result from alleged or real conflicts of interest or unethical practices.

The essence of the Company 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.

Policy on Business Conduct

Sales of the Company's products and services, and purchases of products and services of suppliers shall be made solely based on quality, environmental impacts, 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 supervisor.

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.

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 Managing Director 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 avoid business, financial or other direct or indirect interests or relationships which conflict with the interests of the Company or which divide his or her 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 indirectly 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 conflict of interest unless such business dealings have been disclosed in writing beforehand to the employee's Supervisor or the responsible level of management and a specific nonobjection 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-affiliated business organisation which does a significant business with, or is, a competitor of the Company, without advising their supervisor of such plans before starting the activity. Where the potential for conflict of interest exists, prior specific approval of the employee's Supervisor 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 a 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-length terms and free of 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.

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 his or her supervisor. Each supervisor 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 Managing Director, in writing, of all disclosures and decisions made under this Policy.

To summarise, each employee is obligated to disclose his or her 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 problems 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 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 Managing Director.

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. **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.
2. **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.
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 certify compliance with this Policy. Any false certification — even if directed by a supervisor — will be dealt with severely. 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 line management, including the Managing Director, 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.

The Managing Director will assist in monitoring compliance with this Policy. The outside 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.

This policy has been approved by the Board of Directors and constitutes our group's Code of Business Conduct Policy for the current financial year. This policy will be reviewed annually.

A handwritten signature in black ink, appearing to read "Mark O'Dea".

Mark O'Dea,
Managing Director

1st June 2021

INTRODUCTION

Techrete is committed to providing a working environment for all employees that is free from harassment, threat and intimidation. As part of our commitment to the fairness, dignity and respect of each employee, Techrete will not tolerate any form of bullying or harassment. 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.

SCOPE

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

POLICY

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.

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.

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" – (Health and Safety Authority).

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.

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 n Intimidation/aggressive interactions
- Excessive monitoring of work
- Withholding information necessary for proper performance of a person's job
- Repeatedly manipulating a person's job content and targets n Blaming a person for things beyond their control
- Use of aggressive and obscene language
- Other menacing behaviour

Bullying does not include:

- 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 supervisor relating to the management and direction of employees (for example managing a worker's performance, taking reasonable disciplinary actions, or assigning work), or
- workplace conflict where people disagree with or disregard the others' point of view.

This list is not exhaustive.

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 be reasonably 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.

DIGNITY AT WORK – THE PROCEDURES

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, which prescribes a three-tiered approach, 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 that or is 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 INFORMAL APPROACH

INITIAL INFORMAL RESPONSE

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 or supervisor in raising the issue with the alleged perpetrator(s). In this situation the approach of the manager or supervisor should be by way of a confidential, non-confrontational discussion with a view to resolving the issue in an informal, low-key manner. 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.

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 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.

MEDIATION

Mediation is a form of Alternative Dispute Resolution which has been recommended by the Expert Advisory Group on Workplace Bullying as a means of resolving differences at an earlier, more informal stage.

Techrete may offer employees and alleged perpetrators of bullying, harassment or sexual harassment, the opportunity to enter into mediation, in order to resolve their issues. This process is both voluntary and strictly confidential.

Further details on Mediation can be sought from Human Resources.

It is recognised that it may not always be practical to use the informal procedure or mediation, particularly where the bullying or harassment is serious or where the people involved are at different levels in the organisation. In such instances the complainant should use the formal procedure set out below.

THE FORMAL PROCEDURE

In the event that the initial informal process, the secondary informal process and mediation fails, 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 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 supervisor/ 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.

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.

He/she will then be notified of the manager who will hear this appeal.

In certain cases, the company may offer counselling to either party. 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 EQUAL OPPORTUNITIES AND 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.

VICTIMISATION

Employees will not be penalised, treated less favourably or subject to other adverse treatment because of pursuing rights by way of taking action, supporting action or giving notice of intention to take or support action under equality legislation.

EQUALITY AND DIVERSITY TRAINING

Techrete is committed to ensuring that all employees undergo equality and diversity training. This training includes raising awareness of equality- and diversity-related issues. The equal opportunities and dignity at work policy and legislative requirements will be included in training courses for managers, especially those involved in recruitment, selection, and personal progress reviews.

MONITORING

The Company's equal opportunities and 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.

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 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.

A handwritten signature in black ink, appearing to read "Orla Dunne".

Orla Dunne,
Group HR Manager

1st June 2021

INTRODUCTION

Techrete is committed to providing an environment which promotes equality and dignity at work. We are committed to treating all employees, customers and business contacts equally, regardless of gender, civil status, family status, sexual orientation, religion, age, disability, race or membership of the Traveller community.

The company believes that embracing equality and diversity in the workplace benefits not just the organisation but also individual employees, departments and our customers/clients. Each employee brings their own background, work style, distinct capabilities, experience and characteristics to their work. We recognise that our talented and diverse workforce reflects the diversity of our customer and markets and we want to utilize the widest range of skills, knowledge and experience in our business while complying with legislation.

As well as treating people with dignity and respect, the company strives to create a supportive environment in which all employees can flourish and reach their full potential regardless of differences, experience or education. Harnessing the wide range of perspectives this diversity brings, promotes innovation and helps make us more creative and competitive.

SCOPE

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

TECHRETE'S COMMITMENT

The company will formulate and implement policies and practices that value diversity, provide equality of opportunity and ensure that no job applicant, employee, customer or business associate receives less favourable treatment on any of the above grounds. We will also ensure that other policies and practices reflect our commitment to treating people fairly, promoting an integrated way of working and always respect the dignity of employees.

POLICY

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

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.

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.

Managers are expected to promote an integrated workplace and proactively eliminate any potential inequities which may be counter to the company's policy.

Our recruitment policy reflects our belief that diversity in all areas including cultural, generational, language, and national backgrounds is necessary in helping us succeed in both domestic and international markets. The company will not discriminate against any prospective employee during the recruitment process. Interviews will be carried out objectively and individuals will be judged on merit and their ability to do the job. It is our policy to ensure that as much accommodation as possible is carried out to facilitate the participation of individuals with special needs in the recruitment process and in the workplace.

Performance appraisals and feedback will be carried out in a sensitive, non-discriminatory manner. The company will offer the same development and training opportunities to all employees to achieve high standards of performance. The company rewards excellence and employees will be promoted based on merit.

RESPECT AND DIGNITY AT WORK

All employees have the right to work in an environment that is free from sexual harassment, harassment and bullying and where each individual is respected.

As per our Dignity at Work policy, any individual who experiences sexual harassment, harassment or bullying will be supported by the company in bringing such unlawful behaviour to a close.

All employees will be expected to comply with this policy and management will take appropriate measures to ensure that bullying/harassment does not occur. Appropriate disciplinary action, including dismissal for serious offences, will be taken against any employee who violates this policy.

The policy applies to employees both in the workplace and at work associated events such as meetings, conferences and work-related social events, whether on the premises or off-site.

The policy applies to bullying/harassment not only by fellow employees but also by a client, customer or other business contact to which an employee might reasonably expect to come into contact with, during their employment.

BREACHES OF THE POLICY

Discrimination, bullying and harassment will not be tolerated by the company. 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 regarding employment equality, they may utilise the Grievance Procedure.

Employees will not be penalised, treated less favourably or subject to other adverse treatment because of pursuing rights by way of acting, supporting action or giving notice of intention to take or support action under equality legislation.

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" – (Health and Safety Authority).

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.

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 be reasonably regarded as sexually offensive, humiliating or intimidating.

Discrimination in the workplace is prohibited on any of the following grounds - Age, Medical Record, Criminal Record, Impairment, Civil Status, Mental, Intellectual or Psychiatric Disability, Nationality, Physical Disability, Sexual Orientation or Trade Union activity.

Bullying and Harassment can take many forms. 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
- Intimidation/aggressive interactions
- Excessive monitoring of work
- Withholding information necessary for proper performance of a person’s job
- Repeatedly manipulating a person’s job content and targets
- Blaming a person for things beyond their control
- Use of aggressive and obscene language
- Other menacing behaviour

EQUALITY AND DIVERSITY TRAINING

Techrete is committed to ensuring that all employees undergo equality and diversity training. This training includes raising awareness of equality- and diversity-related issues. The equal opportunities and dignity at work policy and legislative requirements will be included in training courses for managers, especially those involved in recruitment, selection, and personal progress reviews.

MONITORING

The organisation’s equal opportunities and 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.

This policy has been approved by the board of directors and constitutes our group’s Equal Opportunities and Dignity at Work Policy for the current financial year. This policy will be reviewed annually.

A handwritten signature in black ink, appearing to read "Orla Dunne".

Orla Dunne,
Group HR Manager

1st June 2021

This statement for financial year 2019/2020 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 Dublin 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, all new suppliers are risk assessed.

- We conduct internal discussion with commercial and purchasing managers to identify any possible high-risk areas.
- Questionnaires issued to suppliers/subcontractors 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. A risk-based approach is incorporated into our supplier selection.

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:

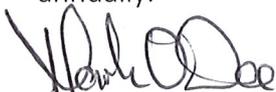
- **Protected Disclosures Policy:** Our protected disclosure policy is intended to encourage and enable workers to raise concerns within Techrete, rather than overlooking a problem. Under this policy, an employee is entitled to raise concerns or disclose information without fear of penalisation or threat 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 right to work checks for immigration status for all prospective employees in the UK 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.
- **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.

A handwritten signature in black ink, appearing to read "Mark O'Dea".

Mark O'Dea,
Managing Director

1st June 2021