

### 1. Introduction

It is the policy of Delmec Engineering to conduct our business in an honest and ethical manner. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and to implement and enforce effective systems to counter corruption, bribery and maintain high ethical standards.

Delmec Engineering are committed to integrity, respect for the law and going beyond the law to advance social and environmental responsibility. The purpose of this Code of Conduct is to assure that we share the clients commitment to such responsible business practices.

Content:

- Ethics and integrity
- Workers' rights
- Workers' protection
- Prohibition of child labour
- Environmental Protection
- Monitoring compliance with the Code of Conduct

### 2. Ethics and Integrity

Delmec Engineering commit ourselves to the highest standard of ethical conduct and integrity. The promotion of business ethics and the fight against corruption are not only the right thing to do; they are also key elements of long term business development.

#### Bribery

The giving or receiving of bribes of any description, regardless of amount, is not allowed. A 'bribe' involves: promising, authorising, giving, or offering payment of money or anything of value (including gifts, meals and entertainment and on cash gifts and other benefits, such as offers of employment, educational placement and charitable donations to individuals or to entities related to individuals); or providing any other benefit or advantage directly or indirectly (i.e. through third parties) corruptly to induce the recipient to misuse his or her position or to obtain an improper advantage with the intention of inducing a person to perform their obligations improperly.

#### Facilitation Payments

Facilitation or 'grease payments' are small value payments made to public officials to speed up a routine administrative process which the public official is obliged to perform by law. Examples are a payment to expedite the issue of a visa, to obtain an official stamp or signature on a document (such as a permit), to enable goods to clear customs or jump a queue. Ireland and many other countries prohibit facilitation payments and Delmec does not permit such payments to be made either directly or by those who work on Delmec's behalf.

### Gifts and gratuities

Delmec ensures that any gift or hospitality:

- is commensurate and not excessive
- is for a bona fide business purpose;
- is given or received openly and transparently;
- complies with applicable laws;
- complies with the rules of the receiving organisation;
- is not given or received frequently between the same individuals;
- is properly recorded.

Delmec will not:

- request or solicit gifts or hospitality from an individual or organisation;
- give or receive gifts or hospitality when engaged in a bidding process;
- give or accept cash or cash equivalents (e.g. Gift vouchers or loans);
- provide or accept any gift or hospitality that is inappropriate, indecent, illegal or could cause reputational damage to both parties;
- pay for any gift or hospitality personally to avoid the approval process or recording requirements.

### **3. Honouring Contracts**

All obligations detailed within contracts entered into between parties must be adhered to. It is not permitted to work “outside” of contracts unless agreed in writing with the authorised executive of the client.

### Protecting Confidential Information

Delmec may receive or encounter information about the client’s business activities, contracts, projects, structure, financial situation or performance. Such confidential information will not be disclosed to any third party without prior written permission from the client. Disclosure of such information will be restricted to those who have a need to know such information and in accordance with applicable regulations and prevailing industry practices. Requesting, receiving, sharing, distributing and the use of confidential information relating to, amongst other things, competitor’s proposals, to gain competitive advantage or market awareness is strictly prohibited.

### Intellectual Property

Delmec will actively support and respect intellectual property rights, regardless of the existence and effective application of local regulation. Delmec will not advertise any contract without prior written approval from the client.

### Fair business practices

Delmec will uphold standards of fair business, advertising and competition and ensure that information provided to customers is not misleading.

### Conflicts of Interest

We are duty bound to report:

- any financial interest that the client's employee may have within our organisation
- any direct (such as a family member) or indirect (such as co habiting) relationships between any member of our organisation and any of the client's company subsidiaries.

### Whistle-blower policy

If Delmec knows or suspects that someone associated with the client, or someone performing services on behalf of the client, has breached the clients Code of Conduct, Delmec will immediately report it.

Delmec maintain policies that protect the confidentiality of whistle-blowers who may raise concerns about ethical or legal issues within both parties.

### Community engagement

Delmec will make the effort to engage in the communities where it operates to promote social and economic development.

## **4. Workers' rights**

### Universal human rights

Delmec respect and promote universal human rights as stated in the United Nations' Universal Declaration of Human Rights. We ensure that we will not assist a State in violating human rights, nor benefits from human rights abuse by a State or by our private or public security forces.

### Harsh treatment and harassment

Our workers will never suffer, or be threatened to suffer any kind of inhumane treatment, including corporal punishment, coercion, verbal abuse, sexual harassment or sexual abuse.

### Involuntary labor

We will not use any form of forced labour, debt bondage or involuntary prison labour. Employees and contractors should be free to leave work or terminate their employment with us after a reasonable notice period. Workers will never be deprived of their identity documents or work permits by their employer or contractor.

### Working hours

Delmec will respect local laws regarding daily and weekly working hours, including laws concerning maximum overtime and working days. Workers must also benefit of at least one full day off per week.

### Wages

Workers must be paid timely at a rate equal or greater to the local minimum wage. All overtime must be compensated according to local law. Salary deductions as disciplinary measures are prohibited.

### Equal opportunity employment

Delmec will not discriminate against any worker based on colour, ethnicity, religion, political affiliation, sexual orientation, gender, age, union membership or marital status in any hiring or employment practices, including in the access of employees to promotion, rewards and training.

### Health status and privacy

Delmec will not seek unnecessary information on the health of workers or potential workers, by any means. Nevertheless, if Delmec receive information about the health status of workers or potential workers, we will abstain from communicating them to any third party. Discrimination, harassment or dismissal of workers on the basis of their health status is prohibited.

### Freedom of association

Delmec will respect the right of workers to freely create or join a labour union of their choice, without suffering any kind of discrimination, intimidation or harassment, in accordance with local law.

## **5. Workers' protection**

### Protection from occupational hazards

Delmec will always abide by our HSEQ policy when undertaking any work on behalf of the client.

All workers must be efficiently protected from safety hazards at the workplace and during their professional travels. All relevant risks must be identified and mitigated through proper design, engineering and administrative controls, preventive maintenance and safe work procedures. If still necessary, workers must be provided with the appropriate personal protection equipment. Workers will not be discouraged to raise safety issues.

Workers using machinery must be protected through an appropriate design of the machine (physical guards, interlocks, barriers, etc.), training and preventive maintenance.

The exposure of workers to biological, chemical and physical hazards, including radio frequency fields, will be identified, measured and mitigated. When necessary, workers must be provided with the appropriate personal protection equipment.

### Emergency preparedness

Delmec will also protect its workers from identified emergency risks (like fire, flooding, hurricane, war, etc.) by adopting appropriate emergency plans, security equipment and evacuation procedures.

### Occupational injuries and illnesses

Delmec will effectively track and record the occupational injuries and illnesses of its workers. It will encourage workers to declare such injuries and illnesses, and provide them with the appropriate treatment. We will also search and mitigate the causes of these harms.

## **6. Prohibition of Child Labour**

### Banning child labour

Delmec prohibits the use of child labour in our operations, and in the manufacturing or execution of the products and services we purchase.

### Physically demanding and hazardous work

Physically demanding and hazardous labour is prohibited for anyone below the age of 18.

### Age verification

To mitigate the risk of employing underage persons, Delmec ensure appropriate checks are undertaken to verify age prior to an offer of employment. Where an individual may appear close to the above age limits appropriate checks should be made to verify they meet the age restrictions set out. Where reasonably practicable this should include the checking of two recognised forms of identification e.g. driving licence, national identity card etc.

## **Environmental protection**

In line with UN's Rio de Janeiro Declaration, Delmec acknowledge that "in order to achieve sustainable development, environmental protection shall constitute an integral part of the development process and cannot be considered in isolation from it."

Therefore, Delmec strive to minimize the adverse environmental impact of its products and services during the whole product life cycle: production, transport, use and disposal or recycling.

### Waste reduction and treatment

Delmec will work to reduce or eliminate the waste produced by all its activities. This goal will be achieved through the improvement of production, maintenance and cleaning processes, modes of conservation and transportation, as well as the substitution, re-use and recycling of materials. Liquid wastes and wastewater must also be reduced, properly treated and controlled before being discharged.

### Dangerous substances

Chemical substances and other materials that could cause damage if released in the environment must be identified and declared to local authorities when required. They must be stored, transported, handled and disposed of in a way that minimizes the risk of release in the environment.

### Gas emissions

During the manufacturing of goods, all emissions of volatile organic, acid or corrosive chemicals, of aerosols, particles, ozone depleting gases and combustion by-products must be monitored, controlled and properly treated.

### Product content restrictions

Delmec adhere to all local and international regulations regarding prohibition or restriction of specific substances, as well as labelling laws, recycling and disposal laws.

### **Delmec Code of Conduct, compliance form**

We hereby confirm to abide by the Code of Conduct above.

Company Name:	
Full Name:	
Position:	
Signature and Date:	

Witness:

Company Name:	
Full Name:	
Position:	
Signature and Date:	