

	Document Title	<b>Anti-Corruption, Anti-Bribery &amp; Anti-Trust</b>		
	Doc. Number	GEN-POL-013	Doc. Owner	General Manager
	Author	Angela Byrne	Revision	Rev. 01
	Reviewed by	Angela Byrne	Approved by	Fiona Spillane
	Next Review Date	09/05/2026	Approved Date	09/05/2025

## 1. Policy Statement

At Shorcontrol Safety we compete vigorously, but with respect to free and fair competition. As a result, we must comply with all applicable Irish & EU anti-corruption, antitrust, antibribery and competition laws. We do not engage in any activities that violate these laws such as agreeing with our competitors to fix prices, discounts, terms of sale, limit service provision, coordinate bidding activities, boycott customers or suppliers, fix employee compensation or agree not to hire each other's employees.

We do not accept or offer bribe or kickbacks, either directly or through third parties. In giving or accepting anything of value we always think about whether doing so could influence a business decision or cause others to perceive such influence. We ensure that the records of all payments we make are always accurate and complete. These obligations apply in all cases and are especially strict in matters involving governing organisations, or any government officials. Our commitment to antibribery applies, without exception to all of our operations. We also expect that third parties acting on our behalf to uphold this commitment.

## 2. Purpose

The purpose of this policy is to provide an outline of Shorcontrol Safety's guidelines and approach taken to ensure compliance with anti-corruption, anti-bribery, and anti-trust laws. We expect and require every employee to act in accordance with applicable law and consistent with our core values and business principles. We also expect our contractors, suppliers, consultant, and any other representative of Shorcontrol Safety to adhere to these standards. Violations or breaches of the policy may lead to disciplinary proceedings for employees, up to and including dismissal.

## 3. Scope

The scope of this policy applies to the following:

- Anti-trust or Competition
- Antibribery and Improper Payment
- Gifts and Entertainment
- Anti-corruption

and it applicable to all employees, representatives, contractors, suppliers, and consultants etc. of Shorcontrol Safety. The policies applies to interactions in our shared professional lives, including daily office encounters, shared online spaces, social media, conferences, meetings, and other events which represent Shorcontrol Safety.

## 4. Definitions

Term	Definition
<b>Bribery and Corruption</b>	Bribery is a form of corruption which includes offering, promising, giving, accepting, or seeking a bribe. Corruption is the misuse of power for private gain. Bribery and corruption are criminal offences.
<b>Bribe</b>	A bribe is a type of improper payment. It is anything of value given or offered to someone for their personal benefit that may be seen as an attempt to influence an action of decision to be made on behalf of the organisation they represent, to benefit or give advantage to Shorcontrol Safety.

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<b>Kickback</b>	A kickback is a form of bribe in which a sum of money already paid or due to be paid is returned as a personal reward for making or fostering a business arrangement.
<b>Good faith</b>	Conducting business with an honest and sincere intention.

## 5. General Policy Guidelines

At Shorcontrol Safety we strive to carry our business activities with the highest standards of honesty, integrity, loyalty, fairness, and discretion as well as to apply all applicable legal and regulatory requirements. Bribery and corruption are criminal offences under Irish law and penalties of such offences can result in a fine and/or prison sentence being imposed.

### 5.1.1 Anti-trust or Competition Laws

Anti-trust laws (also known as competition laws) are designed to preserve and promote business competition by prohibiting formal and informal agreements between competitors, and practices that unreasonably retain trade, such as price fixing and acts designed to abuse a position of market power or dominance. Any breach of these laws is illegal and are contrary to Shorcontrol Safety's Code of Conduct and ethics policy.

Anti-trust laws are actively enforced by international and national competition authorities, many of which collaborate in investigations and prosecutions. Anti-trust violations can result in:

- Large fines for the company or employees
- Lawsuits for damages by third parties
- Imprisonment for employees
- Voiding commercial agreements
- Reputational damage

Anti-trust compliance is a highly complex area and so in any case where an employee is unsure about compliance with anti-trust laws, consult with the General Manager. For any breach in Irish or European competition law, the Competition and Consumer Protection Commission may have the right to seek a criminal prosecution, to pursue the matter in the civil court or both.

### 5.1.2 Unlawful Agreements

Agreements between competitors that lesson competition are automatically illegal under anti-trust law and must never be engaged in. This included agreements to:

- Fix, raise, lower, or stabilise selling prices, or to fix other competitive terms (including pricing formulae, discounts, givebacks or rebates, margins, commissions, and credit terms).
- Fix employee wages or terms of compensation, or to refrain from hiring each other's employees.
- Limit or reduce capacity.
- Share or allocate markets by customer or territory.
- Coordinate bidding activities or 'bid-rigging' (including agreements with other suppliers).
- Boycott any customers or suppliers.

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### 5.1.3 Anti-trust Law Violations

Shorcontrol Safety will not tolerate any violations of anti-trust or competition laws. Any violation will be rerated as a serious matter and will be sanctioned with disciplinary action up to and including termination of employment.

If an employee becomes aware or suspects that anyone is in violation of Shorcontrol Safety’s Code of Conduct & Ethics Policy or this policy, they shall report the concern to the General Manager or other Director. In accordance with our Whistle-blower and Anti-retaliation Policy, Shorcontrol Safety prohibit any retaliation against any individual who reports, in good faith, any breach or violation of these policies.

## 5.2 Anti-Bribery & Improper Payments

Shorcontrol Safety prohibit the offering or making of improper payments, whether made directly or indirectly, and regardless of whether they were paid for by the company or any employee. We also prohibit the creation of false documents or records of any improper payment and prohibit employees and/or third-parties acting on our behalf, from seeking or accepting any improper payment.

The company is subject to Irish and European Anti-bribery laws. These laws do not differentiate between acts made by Shorcontrol Safety or by parties acting on their behalf. For this reason, the company prohibits improper payments offered or made through third parties, contractors, or any other intermediaries. Any third parties acting on behalf of Shorcontrol Safety must apply the company’s code of conduct & ethics.

It is important to be cautious of the following:

- Any request for a payment to a third party that is disproportionate to the services provided.
- Any request to make a payment that appears suspicious or to a name not related to a transaction, including but not limited to a charity, foundation, or political party.
- Background information about existing or potential third-party representatives or other intermediaries that suggest they may be undertaking activities that could be considered improper.
- Giving or receiving business gifts or entertainment during a quoting or tendering process.
- Never offer anything of value to a government official or other person to obtain an actual or perceived improper advantage.
- Never do anything to encourage or facilitate someone else, including a representative of Shorcontrol Safety, to make an improper payment.
- Never request or accept a bribe or kickback.
- Never establish an unrecorded ‘slush’ fund.
- Never make a payment personally in order to avoid complying with Shorcontrol Safety’s Code of Conduct & Ethics or this policy.

### 5.3.1 Gifts & Entertainment

In certain circumstances, a gift given, or entertainment expenses incurred to obtain or maintain business can be considered a bribe, particularly if the gift value is significant or the entertainment is excessive. Except where prohibited by law, Shorcontrol Safety may offer and accept reasonable business gifts and

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entertainment to and from associates, provided that the gifts and entertainment are modest in value and appropriate under the circumstances.

Exchanging gifts or providing entertainment will generally not breach our Code of Conduct & Ethics when they are:

- Given pursuant to accepted business practices, including this policy,
- Not intended to influence any decision making,
- Consistent with applicable law.

Any employee who may have questions about the appropriateness or legality of offering or accepting a particular gift, or providing certain entertainment should check with the General Manager.

Gifts and entertainment are anything of value, including:

- Goods and Services
- Meals and Beverages
- Event tickets
- Cash, Gift cards, Discounts, Prizes, Favours, or any equivalent
- Travel expenses
- Transportation or use of vehicles

It is the responsibility of each employee to protect the reputation of Shorcontrol Safety against allegations of improper behaviour. Employees must exercise care when offering or accepting gifts and entertainment to ensure that business and governance decisions are made with integrity, comply with applicable laws and are in the best interests of the company.

### 5.3.2 Anti-bribery, Gift & Entertainment Violations

Shorcontrol Safety have no tolerance for compliance violations. Any such violations will be treated as a serious matter and will be sanctioned with disciplinary action up to and including termination of employment.

If an employee becomes aware of suspects that anyone is in violation of this policy or the Code of Conduct & Ethics, they shall report the concern to the General Manager or other Director.

### 5.4 Financial Reporting

To ensure compliance with anti-bribery laws and this policy, all business transactions must be properly authorised and must be completely and accurately recorded in Shorcontrol Safety's company books, accounts, and records. Accurate record keeping is important to establish that the company has adequate procedures in place to prevent corruption. These books, accounts, and records must be maintained with sufficient detail to reflect transactions accurately, and fairly.

## 6. Responsibilities

Employee Title/Classification	Responsibility
<b>Directors, Top Management &amp; Senior Management</b>	To ensure the necessary resources are available within the organisation for the implementation of this policy.

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	To ensure the contents of this policy are implemented effectively. To investigate and act upon any breaches or violations which may arise or be reported from individuals citing behaviour related to this policy.
<b>Employees/ Staff/ Instructors/ Sub-contractors</b>	To adhere to the requirements set out in this policy. To report any breaches or violation of this policy to top/senior management for investigation and resolution.

## 7. Enforcement

Employee Title/Classification	Responsibility
<b>General Manager</b>	Has the discretion of determining the repercussion on the discovery of any member of staff, tutors, managers, visitors, or subcontractor's unacceptable behaviour related to this policy. Has the discretion of determining the repercussions on the discovery of a manager or assigned responsible personnel's failure to enforce or follow this policy or its procedures.
<b>Managers and Heads of Departments</b>	Has the discretion of determining the repercussions on the discovery of any subordinate or learner's unacceptable behaviour related to this policy.

## 8. Related Information and Documents

Document ID	Title
GEN-POL-001	Code of Conduct & Ethics
GEN-POL-006	Whistle-blower Protection & Anti-retaliation Policy
<b>External Information</b>	<a href="http://www.enterprise.gov.ie">www.enterprise.gov.ie</a> Competition Act 2002 Competition and Consumer Protection Act 2014 Competition Amendment Act 2017 EU Competition law: Treaty on the Functioning of the EU (TFEU) – Competition regime Articles 101 & 102. <a href="http://www.anticorruption.ie">www.anticorruption.ie</a> Criminal Justice Act 2011 Criminal Justice (Corruption Offences) Act 2018 Protected Disclosures Act 2014

## 9. Policy Review

This policy shall be reviewed when:

- There is a change of General Manager at Shorcontrol Safety.
- There is a change in any of the related policies or procedures found in section 8. '*Related Information & Documentation*' of this document.
- As prescribed in Shorcontrol Safety's policy and procedure review schedule.
- As determined or requested by the General Manager at Shorcontrol Safety.

Revision Date	Author with Title	Description
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<b>13/06/2023</b>	Angela Byrne, QHSM	Initial creation and release of policy.
<b>16/04/2024</b>	Angela Byrne, QHSM	Reviewed – no changes
<b>09/05/2025</b>	Angela Byrne, QHSM	Review – no changes.