

Protected Disclosures Policy Overview

November 2022



The Protected Disclosures policy document sets out how the Company deals with the disclosure requirements of the Protected Disclosures Act 2014 as amended by the Protected Disclosures (Amendment) Act 2022 (the “2014 Act (as amended). This policy is intended to apply to concerns that a Relevant Person may have regarding any aspect of the Company’s activities or the conduct of other members of the Company that is not properly addressed within the scope of other Company policies. It recognises the legitimate right of workers to raise concerns and to be afforded protection when doing so. The policy sets out the internal procedures that are in place for the making of protected disclosures as required under the 2014 Act (as amended).

An overview of the Protected Disclosure policy document is set out below.

Protected Disclosures Policy Overview



- Establishes reporting channels and procedures as set out in the amended Protected Disclosures (Amendment) Act 2022
- Covers the disclosure of information by a Relevant Person who may have a concern regarding daa's activities or the conduct of others in daa that is not within the scope of other company policies
- "Relevant Persons" are employees, independent contractors, agency workers, volunteers, unpaid trainees, board members, shareholders, members of administrative, management or supervisory bodies and job applicants
- "Designated Officer(s)" designated by daa to have responsibility for the administration of the policy
- Not for use for raising complaints relating to interpersonal grievances or conflicts. If a Relevant Person is unsure a matter is within the scope of the Policy they should seek advice from their People Leader/an alternative People Leader

Raising a concern:



- Relevant Person raising concern must respect the confidential nature of the process
- A concern can be raised with:
 - Company Secretary
 - Group Head of Internal Audit or
 - Head of Governance, Insurance and Risk
- Alternatively, use confidential telephone service on 1800 85 11 25, available 24/7 or raise a concern via <https://daa.navexone.eu>
- Disclosure can be made orally, or in writing, or both and Relevant Person must demonstrate/support the reasons for their concern – please refer to Protected Disclosures Policy for points to address in disclosure. The recipient of the disclosure will acknowledge to the Relevant Person in writing not more than 7 days after receipt.
- Once a disclosure is made the Designated Officer will carry out an initial assessment – may seek further information from Relevant Person
- Relevant Person will be informed of the outcome of the initial assessment if the matter should be raised under different policy
- Based on the initial assessment outcome an investigation may be required to be carried out
- Designated Officer will decide & investigator appointed
- Employees subject to investigation have the right to representation
- Feedback will be made to the Relevant Person within reasonable time



- Employees should utilise internal procedures in the first instance
- In rare circumstances, it may be appropriate to report a concern to an external body e.g. a regulator or An Garda Síochána. It is rare, if ever, appropriate to alert the media, and should only be done as a last resort, having exhausted all internal procedures, or where the Relevant Person believes the information reported is substantially true
- A protected disclosure may be made through the following external disclosure channels:
 - Disclosure to a person prescribed in legislation
 - Protected Disclosures Commissioner
 - Other Person(s) with legal responsibility for matters
 - Minister for Transport
 - Person(s) in the course of obtaining legal advice
- If protected disclosure is made other than to the company or external parties other than those listed at 1.14 of the Policy, the Relevant Person should be aware of the higher standards/burden of proof that must be satisfied to obtain the safeguards set out in the Policy and the Act.