

Working with Customers & the Public

Employee Code of Conduct

November 2023



daa depends on people's talent, energy and commitment: our people are at the heart of everything we do. Our values guide us in the delivery of our vision to be an airport industry leader that connects Ireland to the world.

As a company, we have defined our values as respecting each other's value, brilliant at the essentials; passing the baton, not the buck; and always better. With these principles in place to guide us, daa policies and procedures are the basis for working well together.

Because we have responsibilities to each other as well as to customers and passengers, this Employee Code of Conduct is relevant to all of us at daa.



People Policies

Contents

SECTION 1: INTRODUCTION..... 4

SECTION 2: PURPOSE..... 5

 2.1 Personal Behaviours 5

 2.2 Our Principles 5

 2.3 Other Obligations..... 6

 2.4 Clarification 7

SECTION 3: QUICK GUIDE 7

SECTION 4: ABUSE OF POLICY 8

APPENDIX A – FURTHER GUIDANCE 8

APPENDIX B - OTHER RELATED INFORMATION..... 9

 Related daa policies 9

 Document Control..... 10

 Policy Responsibilities 10

 Policy Review 10

Section 1: Introduction

Our everyday behaviour is guided by ethics. We all pride ourselves in our reputation and that of the company we work for. Behaving ethically enhances reputations.

The provisions of this Code apply to all daa group employees.

daa's four core Values are:

1. Respecting Each Other's Value,
2. Passing the Baton not the Buck,
3. Brilliant at the Essentials and
4. Always Better.

Our Values describe the way we work in daa and are brought to life through our Leadership Standard which is a guide for how daa's People Leaders think and act.

Our Employee Code of Conduct provides a set of ethical principles and offers guidance on what actions are acceptable / unacceptable.

The objectives of this Code are to:

- promote the highest standards of legal and ethical management;
- promote and maintain confidence and trust in daa Group;
- ensure everyone acts and behaves in the right way.

To fully understand what is required, employees should also read and be familiar with all policies outlined in Appendix B. These policies are available on the company intranet, through iHR or by request from your local HR representative.

Our Values also guide our behaviours and the "Calling It Behaviour Guide" has been developed to ensure all employees take responsibility to act, behave and treat each other in a way that is in keeping with our Values.

Section 2: Purpose

2.1 Personal Behaviours

Personal behaviour is about the way employees behave and act in day-to-day interactions with colleagues, customers, and the public. Employees are expected to take responsibility for our personal behaviours and to act honourably. It is expected that through our behaviour, we will not do anything that would bring daa into disrepute. Set a good example, take responsibility for our actions, and don't blame others if things go wrong.

2.2 Our Principles

Professionalism

Employees are expected to be loyal to daa and act competently and in a professional manner at all times. This includes being competent in what we do and treating others with fairness, equality, dignity and respect.

From time to time, employees may find ourselves in an uncomfortable situation, where it can be hard to know what is the right thing to do. If in doubt as to what the appropriate behaviour or actions are, employees can, and should, ask their People Leader/Line Manager or whoever they feel comfortable discussing the matter with.

Integrity

Employees are expected to act with integrity. This means being honest and honourable in all matters relating to our employment.

- Uphold an impeccable ethical personal and professional standard.
- Avoid involvement in outside employment or business interests that may be in conflict with daa's businesses.
- Do not use daa's resources for personal gain, for persons/organisations unconnected with daa or its activities or for the benefit of competitors.

- Do not give or accept corporate gifts, hospitality, preferential treatment, or benefits. (see Appendix for further information);
- Become familiar with, and abide by, internal policies and procedures, including in relation to purchasing activities and claiming expenses.
- Comply with laws and regulations.

Confidential Information

Employees are expected to ensure that they :

- Do not acquire information by improper means;
- Respect the confidentiality of sensitive information, including commercially sensitive information, personal information, information received in confidence and price sensitive information.

Employees should take particular care to safeguard adequately all company documents and information.

Confidentiality obligations do not cease when employment in daa has ended.

2.3 Other Obligations

Health and Safety

- daa invests significant resources to maintain a healthy and safe work environment. Employees are expected to comply with daa policies in relation to health and safety.

Environment

- daa will endeavour to minimise any detrimental impact of its operation on the environment and actively promotes its environmental policy. Employees are expected to respect the environment.

Internal Audit

- Employees are required to co-operate with internal audit in the internal audit process.

Disclosure

- If employees are aware of any unlawful or unethical situation, they should tell their People Leader/Line Manager, or an alternative senior manager, what they know or have heard. Further guidance is available in the Anti-Bribery, Corruption and Fraud Policy and the Protected Disclosures Policy.

Ethics

- Depending on our role in the organisation, employees may be required by law to make annual statutory disclosures on matters that could give rise to conflicts of interest. Employees will be advised by the HR team if the disclosure provisions apply to us.

2.4 Clarification

If employees have any doubts, or require clarification, on any aspect of this Code, please consult with your People Leader/Line Manager or local HR representative.

Section 3: Quick Guide

The following is a quick guide which will assist in determining if behaviour is acceptable in any work-related situation. If there is any doubt about how to act or behave in any situation, start by asking these six questions:

1. Is what I am doing or being asked to do ethical and consistent with this Code?
2. Am I setting a good example?
3. Would I be comfortable explaining my actions to others?
4. Would customers and colleagues say I am acting with integrity?
5. In 5 years' time would others see this as a good way to work?
6. Would I be comfortable if my actions were reported in the newspapers?

Be comfortable asking for advice. If employees are unsure about anything, please seek the opinion of your manager, local Head of HR or daa's Company Secretary.

Section 4: Abuse of Policy

Where daa has reasonable grounds for believing that the Code is not being complied with, an employee may be subject to an investigation. If following an investigation, facts are established that there has been abuse of the Code of Conduct this may lead to disciplinary action, up to and including dismissal, in accordance with the Disciplinary Policy.

Appendix A – Further Guidance

Regarding Gifts, Hospitality And Expenses (as per Appendix 2 of the Anti-Bribery, Corruption & Fraud Policy)

The Anti-Bribery, Corruption & Fraud policy allows reasonable, appropriate and bona fide gifts, hospitality or entertainment given to or received from third parties.

The giving and accepting of a gift is generally acceptable if the following conditions are met:

- it is not given or could not be perceived to be given, with the intention of unethically/illegally influencing the outcome of a business negotiation;
- details of the gift are provided to the line manager;
- it is given in the name of the company, not in our own names;
- it does not include cash or a cash equivalent (e.g. gift certificates or vouchers);
- the gift is unsolicited and of low value (recognising the country where the gift is made or received);
- it is appropriate in the circumstances, taking account of the reason for the gift, its timing and value. and
- it is given openly, not secretly.

Clearly there are occasions in which business expenses may be required to be reimbursed. However, a payment in excess of genuine and reasonable business expenses is not acceptable.

Gifts or hospitality in contravention of law are unacceptable. We should not solicit gifts and likewise gifts should not be given in response to specific requests.

The test to be applied is whether in all the circumstances the gift, hospitality or payment is reasonable and justifiable. The intention behind the gift/hospitality should always be considered. Each situation is different and must be considered in the particular circumstances. Reasonable entertainment is allowed, for example, hospitality given to customers, suppliers, partners as part of company meetings or events is allowed. Particular care should be exercised when tender processes are being conducted.

USING COMMON SENSE IS IMPORTANT

Appendix B - Other Related Information

Related daa policies

This policy should be read in conjunction with the following daa policies:

- Anti-Bribery, Corruption and Fraud Policy
- Disciplinary Policy
- Protected Disclosures Policy
- Dignity and Mutual Respect at Work Policy
- Calling It Behaviour Guide
- IT Security Acceptable Use Policy
- Data Protection Policy and Guide
- Information Security Policy
- Employee Privacy Policy
- Child Safeguarding Statement,
- Code when interacting with children, which includes steps for reporting child protection concerns,
- Procurement Policy,
- Safety Statement
- Travel, Expense & Credit Card Policy

Document Control

Owner	Employee Relations, HR
Author	HR Policies & Governance Support Lead

Version Control	Version Title & Short Description	Date
Version 1	The policy sets out the expectations from all daa staff from an ethics perspective	October 2012
Amendment 1	Reformatting for iConnect upload	February 2014
Version 2	Code of Practice update	December 2017
Version 3	Publication Update	March 2018
Version 4	Review and update	February 2020
Version 5	Review and update	January 2021
Version 6	New template for Employee Code of Conduct and review	August 2023

Policy Responsibilities

The following are responsible for developing, communicating, and implementing this Policy:

- Group Human Resources - policy formulation and communication
- daa Executive Team - approval of changes to the policy
- Human Resources - for developing and agreeing appropriate procedures to implement this policy
- Manager – adhere to this Policy and answer any queries members of their team may have
- Employees – adhere to this Policy

Policy Review

This policy will be reviewed every two years. In addition, the policy may be reviewed in the event of any of:

- A change in legislation
- Significant changes in the workplace
- After a formal request and review by key stakeholder

