

HRP22 Kirby Anti Bribery and Corruption Policy

Adopted:	10 th December 2019
Contact Officer:	Fergus Barry
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Version/Reviewed by:	Rev 1. 23.09.2025 by Fergus Barry
Next Formal Policy Review:	1 Yearly
Formal Review of Policy by:	Fergus Barry
Policy Links:	This policy links to all policies, procedures and strategy documents adopted by Kirby Group Engineering.
Policy signed into effect by:	

Brief Policy Summary:

The purpose of this Policy is to set out the responsibilities for everyone working for Kirby to observe and uphold this Policy to prevent bribery and corruption and to provide information and guidance to all working for and with Kirby on how to recognise and deal with potential bribery or corruption offences that could arise.

Introduction

Kirby Group Engineering ulc and its subsidiaries (Kirby) takes a zero-tolerance approach to bribery and corruption across all jurisdictions where we operate as a business. Our policy is to conduct all our business operations with honesty, integrity and fairness in relation to all our corporate activities, customer, supplier and contractor engagements.

Purpose

The purpose of this Policy is to set out the responsibilities for everyone working for Kirby to observe and uphold this Policy to prevent bribery and corruption and to provide information and guidance to all working for and with Kirby on how to recognise and deal with potential bribery or corruption offences that could arise. This Policy is in compliance with applicable anti-bribery and anti-corruption legislation in place in the jurisdictions where we operate, including but not limited to, the Criminal Justice (Corruption Offences) Act, 2018 in Ireland, the Bribery Act, 2010 in the UK, the Dutch Criminal Code in the Netherlands and generally recognised international best practice.

What is Corruption?

Corruption can be broadly defined as acting with an improper purpose personally or by influencing another person for private gain of the individual or a company. Corrupt offences include corruptly offering, giving, requesting, accepting or obtaining a gift, consideration or advantage as an inducement to or reward for any person doing an act in relation to his/her office, employment, position or business.

What is Bribery?

A bribe is an inducement or reward offered, promised or provided in order to gain a commercial, contractual, regulatory or personal advantage, whether received intentionally or unintentionally.

Who is covered by this Policy: -

Everyone that is employed or engaged by Kirby must strictly comply with this Policy. This Policy should also, to the fullest extent possible, be applied to all third parties that are contracted or engaged by Kirby.

Consequences of Breach of this Policy

A breach of this Policy may result in disciplinary action amounting to gross misconduct and may lead to sanctions up to and including dismissal. Where appropriate the matter will be reported to the relevant Police Force. Any person that is in breach of this Policy may also incur personal criminal liability under applicable legislation where the maximum punishment includes up to ten years imprisonment and unlimited fines. Non-compliance is both an offence for you and for Kirby.

Corporate gifts, hospitality & entertainment

This Policy does not prohibit normal and appropriate corporate gifts, hospitality & entertainment (given and/or received) to and from third parties. Such corporate gifts, hospitality & entertainment must not be corruptly given or taken and should be openly given/received, proportionate, reasonable and made in good faith in adherence with the requirements of this Policy. Kirby shall maintain a register of such corporate gifts, hospitality & entertainment given to third parties.

What is not acceptable?

It is never acceptable for you, (or someone on your behalf) to: -

- A. Give, promise to give, or offer a payment, gift, consideration or advantage (whether directly or indirectly) with the expectation or desire that a business advantage will be received or to reward a business advantage as already received.
- B. Accept a payment, gift, consideration or advantage from a third party that you know, or reasonably suspect is offered with the expectation that it will provide a business advantage for them.
- C. Threaten or retaliate against someone for adherence to this Policy and applicable legislation. Engage in any activity that may lead to a breach of this Policy.

Your responsibilities include:

- You must read, understand and comply with this Policy.
- Everyone working with Kirby must take responsibility for prevention, detection and reporting of bribery or corruption.
- This Policy should be communicated with all suppliers, contractors and business partners from the outset of such relationship and as appropriate thereafter.
- If you see anything while working for Kirby that you believe is in breach of this Policy, you should report it to your line manager or Kirby's compliance manager.

How to raise a concern.

Should you have suspicion or concern about any issue that could be deemed as bribery or corruption as defined in this Policy, you should report same to your line manager or the Group Head of Human Resources. Such reports will be treated as protected disclosures as further defined in the Group Employee Handbook.

Who is responsible for this Policy?

The Managing Director, on behalf of the board of Kirby has overall responsibility for ensuring that this Policy complies with Kirby's legal obligations, and for ensuring compliance by all in Kirby. Management at all levels are responsible for ensuring that those reporting to them are made aware of and understand this Policy and are given adequate and regular training in respect of it.

Review of this Policy

Kirby shall review this Policy from time to time in respect of its suitability, adequacy and effectiveness and reserve the right to amend this Policy at any time.