

Anti Bribery & Corruption Policy

INTRODUCTION:

In Coen Steel, we strive to conduct our business activities in accordance with the highest standards of honesty, loyalty, fairness, and discretion and to comply with all applicable legal and regulatory requirements. A culture of openness and accountability is essential to prevent improper situations occurring and to address them promptly when they do occur. We have a zero-tolerance policy in relation to bribery, corruption, fraud, and other wrongdoing. This Policy aims to facilitate those goals.

This Policy applies to all directors, employees, contractors, casual workers, and agency workers (collectively referred to in this Policy as “staff”) in Coen Steel and to third parties with whom we do business, including suppliers. As a general matter, all staff, as well as third parties doing business with Coen Steel are expected to comply at all times with the laws of Ireland and any other country in which they may be working.

Key rules

This policy requires employees, contractors, and suppliers to comply fully with the following key rules:

- **Do not give bribes:** Do not in any circumstances make payments or provide gifts, entertainment, or favours if this could lead to someone misusing their position or performing their job improperly. This particularly includes circumstances where the gift, entertainment or favour led them to do something or not do something they are not permitted to do, or which they would not ordinarily do.
- **Do not accept bribes:** Do not in any circumstances request, agree or accept gifts, entertainment, or favours if this could lead to you misusing your position or performing your job improperly. This particularly includes circumstances where the gift, entertainment or favour leads you to do something or not do something you are not permitted to do, or which you would not ordinarily do.
- **Public officials:** Do not provide gifts, entertainment, or favours to public officials for business reasons, except in strict accordance with our rules and the rules applying to the public official.
- **Gifts and entertainment policy:** To help ensure risks associated with bribery and corruption are avoided, this policy requires that you do not provide or receive payments or gifts, entertainment, or favours if this could lead to you or someone else misusing their position or performing their job improperly. To support this policy, the following rules must be followed at all times in respect of the giving and receiving of gifts and entertainment.

When gifts and entertainment are permitted

Gifts and entertainment are permitted only when:

- They are intended to foster legitimate (i.e., lawful) business relations;
- Their nature and timing, and the circumstances in which they are given, are not capable of either improperly influencing the recipient, or being perceived as improperly influencing them; and
- The rules or laws applying to the recipient, particularly if they are public officials, will not be breached by the giving of the gift or entertainment.

Gifts of cash, or equivalent (such as vouchers or pre-paid cards) are strictly prohibited.

Value limits – entertainment and hospitality

Entertainment (such as meals, events, or corporate hospitality) may be given to or received from any single person or organisation to a maximum limit of €1000 per person in any twelve- month period. An employee can give or receive entertainment or hospitality to a maximum of €1000 in any twelve-month period. Regardless of these limits, all invitations received to attend corporate hospitality events must be submitted to Management who will seek confirmation as to whether or not the invitation may be accepted, and who from Coen Steel should attend.

Value limits - gifts

Gifts may be given to or received from any single person or organisation to a maximum limit of €1000 per person in any twelve-month period. An employee can give or receive gifts to a maximum of €1000 in any twelve-month period.

Sponsorship and charitable donations

Sponsorship and charitable donations may only be made by or on behalf of Coen Steel with the prior approval of the CFO, CEO, COO (Senior Management Team).

Exceeding value limits

The value limits above may be exceeded only with the prior authorisation of Management who, on receiving any request for the value limit to be exceeded, shall consult with the Senior Management Team before confirming whether the limit may be exceeded and any associated conditions.

Gift and hospitality register

The Finance Team is required to maintain a Gift and Hospitality Register. The Gift and Hospitality Register is intended to help the business monitor:

- For any risks of bribery and corruption;
- Gifts or hospitality received or provided by Coen Steel employees meet the requirements of this policy;
- Employees giving or receiving gifts, hospitality, entertainment, or sponsorship in connection with their employment by Coen Steel must ensure it is recorded on the Gifts and Hospitality Register; It is the responsibility of Management to ensure the Gift and Hospitality Register is maintained and up to date;
- Claims that include costs for gifts, hospitality or entertainment cannot be submitted for payment to finance and processing until the Gifts and Hospitality Register has been verified as including the relevant gifts, hospitality, or entertainment.

Reporting a concern

If you have any concern about gifts, entertainment, or hospitality, speak with your manager about the best way to raise your concern.

Individuals who make a protected disclosure

Coen Steel will not tolerate any harassment or victimisation of an individual who makes a protected disclosure, and the Company will take appropriate action if harassment or victimisation occurs. Any evidence given, that difficulties for the discloser occurred due to them raising a genuine concern will be treated very seriously and is likely to result in disciplinary action.



Michael Curtin

COO

Reviewed: Sept 2023