

Document Reference:GP01	The Primeline Code of Ethics (Business Ethics, Modern Slavery & Human Trafficking & Anti Bribery/ Anti-Corruption)	
Frequency & Responsibility	Frequency: As Required	Responsibility: HR
Revision: 01	Effective Date: 1/04/2024	

Introduction

The Primeline Group is committed to conducting business in an ethical and honest manner. The Primeline Group will act professionally, fairly, and with integrity in all business dealings and relationships, wherever we operate.

Primeline expects and demands that each of its business units, all of its colleagues, and its directors carry out their business and perform their duties to the highest ethical standards and in compliance with all relevant legal principles. This standard of behaviour and performance is maintained in the Company's dealings with colleagues, customers, suppliers, and all other stakeholders.

Scope

The Code of Ethics covers all colleagues employed by Primeline across UK & ROI.

Aim of the Code of Ethics

The Company and its colleagues will at all times demonstrate the highest levels of integrity, truthfulness, and honesty in order to uphold both personal and corporate reputations and to inspire confidence and trust in their respective actions. The Company will conduct its business in a competent, fair, impartial, and efficient manner.

The Primeline Code of Ethics encompasses our approach to the following;

- Primeline Business Ethics
- Modern Slavery & Human Trafficking
- Anti Bribery & Anti-Corruption

Business Ethics

Health and Safety

The Company is committed to providing a safe and healthy working environment for all colleagues both on and off its sites in compliance with all applicable laws and regulations. There is a program of regular health and safety audits and safety training. The Company applies its standards to all visitors to its sites.

Environment

The Company respects the environment and the need to protect it and minimise the impact its operations have on it. Primeline is committed to complying with all applicable environmental legislation and regulations.

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The Company is engaged in a continuous program of improvement on environmental issues and opens itself to independent third party verification, inspection, and certification of its progress.

Colleagues

All colleagues are treated with dignity and respect and with equal employment opportunities given to all irrespective of their race, religion, gender, sexual orientation, maternity, marital status, family status, disability, age, or national origin. Colleagues are offered a safe and healthy workplace, and the Company will not tolerate any form of harassment or deviation from this. Primeline have the appropriate frameworks in place to deal with any deviation to the expectation.

Customers

The Company will take care to avoid misleading statements, concealment, and overstatement in all of its advertising and public statements. It will seek to build long term partnerships with its customers by being honest and straightforward in its dealings at all times. It will respect the confidentiality of any information that it might obtain in relation to its customers.

Suppliers

Suppliers will be chosen on the basis of a number of elements such as integrity, Health and Safety performance, quality, price and adherence to the Supplier Code of Conduct. The Company’s choice of suppliers will be made objectively. Honesty and openness will be paramount in the Company’s dealings with its suppliers.

Competitors

The Company will build its reputation on the basis of its performance alone. It will compete vigorously and lawfully and will not compete unfairly with others. It will not seek to damage the reputation of its competitors either directly or by implication.

Government, Regulators, and Legislators

The Company will comply with international, national, and local legislation affecting its operations. It will meet its tax obligations. It will not make any financial contributions or offer support to any political party.

Giving and Receiving Gifts and Entertainment

Colleagues will neither seek nor accept for themselves or others any gifts, favours, or entertainment without a legitimate purpose from any person or business organisation that does or seeks to do business with, or is a competitor of, Primeline Group. Further details are outlined below in the Anti Bribery & Anti-Corruption Statement.

Bribes and Corrupt Practice

The Company does not allow direct or indirect offer, payment, solicitation, or acceptance of bribes in any form. Further details are outlined below in the Anti Bribery & Anti-Corruption Statement.

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Modern Slavery & Human Trafficking Statement

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. The business ethics & modern slavery statement is aligned to the ETI Base Code (Appendix 1). Our Modern Slavery and Human Trafficking statement demonstrates our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Due Diligence processes for Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk we conduct assessments of our supply chains and our agency labour providers. We have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Drive best practice in tackling modern slavery and human trafficking.
- Protect whistle blowers, with a separate whistle blowing policy.

Supplier Adherence to our Values

We encourage and expect our suppliers and labour providers to comply with best practice in tackling modern slavery and human trafficking. Primeline will guide, advice and support our suppliers and labour providers where necessary to address instances where they do occur.

Prior to working with any labour provider or supplier, the Company conducts a comprehensive due diligence exercise to ensure that legal and the Company standards can be met.

Following a self- assessment, we will evaluate the labour and human rights performance of our supplier/s and decide whether they meet the criteria to engage their services. This will ensure all those in our supply chain and contractors comply with our values.

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Anti Bribery & Anti-Corruption Statement

What is bribery?

Primeline expects colleagues to comply with all applicable laws and regulations (The Criminal Justice (Corruption Offences) Act 2018 , Ireland, and the UK Bribery Act 2010.

A person who gives a gift, consideration or advantage to another person where the first- mentioned person knows, or ought reasonably to know, that the gift, consideration or advantage, or a part of it, will be used to facilitate the commission of an offence under the Acts, shall be guilty of an offence.

A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage.

Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

Bribery is illegal. Colleagues must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor). They must not bribe a foreign public official anywhere in the world. They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from their direct SLT member.

What is and what is NOT acceptable ?

Gifts and Hospitality

The Primeline Group accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

- It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
- It is not made with the suggestion that a return favour is expected.
- It is in compliance with local law.
- It is given in the name of the Company, not in an individual's name.

It does not include cash

It is appropriate for the circumstances (e.g. giving small gifts at Christmas)

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It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.

- It is given/received openly, not secretly.
- It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- It is not above a certain excessive value, as pre-determined by the SLT - (usually in excess of €150).
- It is not offered to, or accepted from, a government official or representative or politician or political party.

Where it is inappropriate to decline the offer of a gift (i.e. when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to the Company director responsible, who, will assess the circumstances.

The Primeline Group recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each.

As good practice, gifts given and received should always be disclosed to the SLT member. Gifts from suppliers should always be disclosed.

The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of the Company director responsible should be sought.

Facilitation Payments and Kickbacks

The Primeline Group does not accept and will not make any form of facilitation payments of any nature. We recognise that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for routine governmental action.

We recognise that they tend to be done by low level officials with the intention of securing or speeding up the performance of a certain duty or action.

The Primeline Group does not allow kickbacks to be made or accepted. We recognise that kickbacks are typically made in exchange for a business favour or advantage.

The Primeline Group recognises that, despite our strict stance on facilitation payments and kickbacks, employees may face a situation where avoiding a facilitation payment or kickback may cause embarrassment or potential compromise.

In any such case the matter must be referred to the Company director responsible for action and resolution.

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Political Contributions

The Primeline group will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates. We recognise this may be perceived as an attempt to gain an improper business advantage.

Charitable Contributions

The Primeline Group accepts and indeed encourages the act of donating to charities – whether through services, knowledge, time, or direct financial contributions and agrees to disclose all charitable contributions it makes.

The Primeline Group will always ensure that charitable contributions are not used to facilitate and conceal acts of bribery or corruption.

The Primeline Group will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered/made without the approval of the SLT.

Training and Communication

The Primeline Group will provide training on this statement as part of the induction process for all new colleagues.

Colleague Responsibilities

As a colleague of The Primeline Group you must ensure that you read, understand, and comply with the information contained within this statement, and with any training provided.

If any colleague breaches this statement, they could face disciplinary action and could face dismissal for gross misconduct.

How can a colleague raise a concern?

If a colleague wishes to raise a concern, they should use the grievance process. Colleagues are encouraged to raise concerns at the earliest opportunity.

In addition you may also wish to raise a concern via a protected disclosure under the Company’s whistleblowing policy.

If you refuse to accept or offer of a bribe or you report a concern relating to potential act(s) of bribery or corruption, the Primeline Group understands that you may feel worried about potential repercussions.

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We will support anyone who raises concerns in good faith under this statement, even if investigation finds that they were mistaken.

The Primeline Group will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer of a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.

Detrimental treatment refers to dismissal, disciplinary action or unfavourable treatment in relation to the concern the individual raised.

Appendix 1 ETI Base Code

ETI Base Code



Ethical Trading Initiative

The ETI Base Code is an internationally recognised set of labour standards based on ILO conventions. It is used by ETI members and others to drive improvements in working conditions around the world.

www.ethicaltrade.org



Employment is freely chosen



Freedom of association and the right to collective bargaining are respected



Working conditions are safe and hygienic



Child labour shall not be used



Living wages are paid



Working hours are not excessive



No discrimination is practised



Regular employment is provided



No harsh or inhumane treatment is allowed

For human rights, for better business

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