

POL-327 CODE OF CONDUCT**1.0 PURPOSE**

The Code of Conduct is intended to set the standard of behaviour expected of employees as they carry out their duties in Irish Lights. It is incumbent on everyone in the organisation to adhere to the principles of integrity, loyalty, legality, confidentiality and fairness, in the discharge of their duties.

These standards of behaviour and values will support a high quality service based on high levels of personal performance and responsibility. Adherence to this Code should prevent the development or acceptance of unethical practices and ensure that all Irish Lights operations are conducted with integrity thereby preserving its reputation.

2.0 SCOPE

This Code of Conduct is applicable to all employees.

3.0 DEFINITIONS

A Code of Conduct describes principles or standards that govern the behaviour of employees, together with examples of conduct that is expected in accordance with the Code. Situations and circumstances will arise in the course of employment which are not listed in this document but employees are expected to be mindful of the requirements for integrity, loyalty, legality, confidentiality and fairness, when dealing with or making decisions in relation to such circumstances.

4.0 RESPONSIBILITIES**4.1 Irish Lights**

It is the policy of Irish Lights to be honest and ethical in all operations and dealings, to adhere to the highest accepted standards of corporate governance in all financial and management practices and to behave responsibly towards the health, safety and welfare of employees and to the environment.

4.2 Managers

Managers must lead by example and take immediate action on any breaches that are brought to their attention.

4.3 Employees

- Maintain high standards of delivery by discharging responsibilities conscientiously, honestly and impartially, always acting within the law and performing their duties with efficiency, diligence and courtesy
- Observe appropriate behaviour at work by dealing with colleagues and customers fairly, promptly and with respect
- Maintain highest standards of integrity by avoiding conflicts of interest and conducting themselves with honesty and impartiality
- Support and be loyal to Irish Lights by ensuring any actions taken maintain confidence in Irish Lights.

5.0 PROCEDURE

Certain Standards of Behaviour are expected of all employees in Irish Lights. The examples to follow are intended only to illustrate the application of the principles in certain circumstances and should be read in conjunction with other policies referred to.

5.1 Integrity

The principle of integrity is that each employee should be open, truthful and honest in all their dealings with Irish Lights and in all business dealings, operations or transactions on behalf of Irish Lights.

- Employees are expected to behave with integrity not only in the workplace, but also while representing Irish Lights offsite e.g. at an external meeting, on a training course, at a function or event. Employees must adhere to all Irish Lights policies in such circumstances.
- Employees have a responsibility for ensuring the most efficient use of Irish Lights equipment and resources. They should be alert to any situation that could lead to a loss, theft or misuse of Irish Lights property. Any unauthorised use of Irish Lights facilities, property or equipment, whether or not for personal gain, may be considered a disciplinary matter. Employees are required to familiarise themselves with the various Technology and Data Policies.
- Employees are entitled to reimbursement for reasonable expenses, but only if these expenses are actually incurred. The submission of claims for expenses not incurred represents dishonest reporting and is strictly prohibited.
- Each employee is responsible for ensuring that Irish Lights image is not damaged in any way by the acceptance of gifts or hospitality, which would compromise their position, or Irish Lights

itself. Employees are required to familiarise themselves with and adhere to the ***Gifts, Hospitality and Sponsorship Policy***.

- Where an employee has an interest in a company, which supplies products or services to Irish Lights, he/she must not attempt to influence decisions regarding the selection process in order to obtain special treatment for a particular supplier. Any attempt would undermine the integrity of Irish Lights and will be in breach of procurement regulations.
- All business transactions should be properly accounted for, reported and recorded.

5.2 Loyalty

Loyalty requires each employee to put the interest of Irish Lights first. In practice, an employee should avoid circumstances where their loyalty to Irish Lights is, or might be, interpreted as being compromised.

- A conflict of interest may arise if an individual engages in any activity, or advances any personal interests, at the expense of Irish Lights interest. Employees are required to manage conflicts of interest to ensure that the reputation of Irish Lights is maintained.
- Employees should not become engaged in outside activities or have a business or financial interest that may be in competition with Irish Lights or could be regarded as being a conflict of interest with their terms and conditions of employment.
- It is the duty of the employee to properly disclose, in writing, to their manager any factor that could give rise to a conflict of interest situation. It must be emphasised that it is the existence of the interest, and not just a potential conflict of interest, that must be disclosed.
- Irish Lights may request employees to discontinue their involvement in any activity or interest which could potentially be in conflict with the interests of the organisation, impair the ability of employees to perform their work in a satisfactory manner, or have adverse effect on their attendance.
- Employees should not seek or accept, directly or indirectly, any payments, fees, services or loans from any person or business entity that does or seeks to do business with Irish Lights (see ***Gift, Hospitality and Sponsorship Policy***).

5.3 Legality

Irish Lights will comply with all relevant Statutory and Regulatory requirements and will at all times adhere to best practice in its operations. Each employee must:

- Comply with all Health and Safety Regulations and Safety Statements
- Comply with the General Data Protection Regulations
- Comply with all internal policies and procedures designed to prevent fraud or injury to persons, the property of Irish Lights, or the interest of Irish Lights generally
- Attend work as required and comply with their terms and conditions of employment.

5.4 Confidentiality

Information obtained in the course of employment should never be used for personal benefit.

- Irish Lights confidential information should not be disclosed to third parties, including the media.
- Protecting organisational information also means reporting information as completely and accurately as is practical, thereby all employees must ensure all information reported is accurate, relevant and timely. Dishonest reporting, such as false or misleading statements/reports, both internally and externally, is strictly prohibited and considered gross misconduct.
- In particular, employees who have access to confidential or personal information by virtue of their day to day duties, should be aware of the absolute necessity of ensuring that such information is never discussed with any unauthorised person. It is Irish Lights policy to comply with the requirement of the Data Protection Acts. Please refer to the **Data Protection Policy** for further details.
- Employees should respect the confidentiality of information received from those with whom Irish Lights does business and should ensure that no improper use of such information is made.
- Where other companies are prepared to disclose information and allow Irish Lights to use this proprietary information for a particular purpose, they may seek information from Irish Lights in return. Where requests of this nature are made, and before being disclosed, employees must seek permission to release such information from their Director.
- Employees who leave Irish Lights are obliged to ensure that intellectual property developed by, or entrusted to them, is maintained by the organisation. There is an onus on leavers to ensure that, under no circumstances, this property is disclosed to outside agencies, or prospective employers, who may operate in the same or a similar market as Irish Lights.

5.5 Fairness

Irish Lights is committed to fairness in all operations and all dealings with its employees. This requires that each employee must be fair in each of their individual dealings with those with whom Irish Lights does business and with fellow employees.

- All individuals and organisations with whom business is conducted and colleagues must be treated fairly and with respect at all times.
- All suppliers are entitled to fair treatment and each should have a reasonable opportunity to win our business.
- Employees should show due respect to their colleagues including their beliefs and values.
- Irish Lights is an Equal Opportunities Employer and fairness requires compliance with all Equality and Equal Status legislation. Please see Irish Lights Policies in relation to ***Equality, Diversity and Inclusion , Dignity at Work.***

5.6 Raising Concerns

Employees or managers who have concerns about the conduct of their colleagues or teams are required to report their concerns to their manager or Director.

The ***Grievance Procedure*** is available for employees to raise a perceived problem or dissatisfaction with the organisation.

In exceptional circumstances, an employee may wish to make a Protected Disclosure about corporate misconduct. This refers to a situation where a person tells the organisation, a regulator, the police or the media about a dangerous or illegal activity that they are aware of through their work. This is sometimes referred to as “***Whistleblowing***”. To raise a concern of this nature please see the ***Speaking Up Policy***.

5.7 Compliance

The behaviour and conduct of employees as they carry out their duties is guided by a number of policies which are referenced in this Code and are set out in the Irish Lights Employee Handbook. Employees are required to consult the Handbook and to be familiar with the full policies which are available on the intranet (Controlled Documents Area).

Employees are expected to comply with the Code at all times. Breaches of the Code may result in disciplinary action, up to and including dismissal.

6.0 INTERNAL MONITORING AND REPORTING REQUIREMENTS

Human Resources will regularly assess the effectiveness of the policy. Refresher training will be provided to all employees every two years.

Irish Lights reserves the right to revoke, replace or amend this policy at any time as deemed appropriate.

7.0 APPENDICES

8.0 ADVICE

Please seek advice from your Director or the Head of Human Resources.

9.0 ACCESS RESTRICTIONS

Available to all employees.

10.0 REFERENCES/CONNECTED DOCUMENTS

- Dignity at Work Policy
- Data Protection Policy
- Disciplinary Procedure
- Equality, Diversity and Inclusion Policy
- Fraud Policy
- Gifts, Hospitality and Sponsorship Policy
- Grievance Procedure
- Social Media Policy
- Speaking Up Policy
- Participation in External Bodies in a Professional Capacity Procedure

11.0 REVIEW PERIOD

Three year cycle or as process and/or legislative changes require



Issued	Version No.	Pages	Doc No
09.01.2023	V02	7	POL-327

VERSION HISTORY

Revision	Description of Change	Date
00	First Issue	11/06/2004
01	New Logo and Layout	01/09/2016
02	The new <i>Participation in External Bodies in a Professional Capacity</i> has been added to the Reference List at the end of the policy. Updates to names of other policies also noted.	12/08/2022