

## **Mission Statement for Operating Ethically**

O'Keefe Construction (Byrne Group) Limited and O'Keefe Demolition (Byrne Group) Limited are market leaders in the Construction, Soil Stabilization and Demolition Sectors, and we take a zero-tolerance approach to bribery and corruption of all kinds. This promotes openness and transparency, and to seek the highest professional standards across its different areas of activities.

**Bribery** is when a person offers, promises or gives a financial (or other) advantage to another person with the intention of inducing or rewarding that person to act improperly, or when a person requests, agrees to receive or accepts a financial (or other) advantage to act improperly.

**Corruption** is any form of illegal, dishonest or bad behaviour, especially by people in positions of power.

This policy sets out O'Keefe's commitment that it and its employees, Supply Chain Members and any other associates will adhere strictly to all relevant legislation in relation to bribery and corruption and will follow any procedures designed by the business to prevent bribery.

We will continue to monitor this policy and a range of other anti-corruption compliance measures put in place, and will continue to develop. Should any employee have questions regarding the obligations set out in this policy they should contact their HR Manager, and Supply Chain Members or other associates should, in the first instance, contact their usual O'Keefe contact.

## **Responsibilities**

The Managing Director holds ultimate responsibility for this Policy while the Department Leads are responsible for ensuring that it is met within their department. All Employees will be made aware of the Company policy and their personal responsibilities, and that they must ensure to adhere strictly to this policy.

## **Our Commitments**

O'Keefe is committed to ensuring that it, all employees and all third parties performing services for or on behalf of O'Keefe abide by the highest ethical standards. This includes:

1. Employees must not offer, promise or give bribes and they must not request or receive bribes. We also expect the highest standards of compliance in this area from all of our Supply Chain Members and other associates.
2. Employees must not participate in any activity to which a bribe relates, nor must they allow a bribe to effect performance.
3. Employees have wider duties to speak up or report malpractice in this area or related procedures. A deliberate failure to report suspicions of corruption or to conceal bribes by others will also be subjected to disciplinary action.
4. We encourage all employees to report any corruption concerns immediately and we will support employees that do so. All reporting will be handled sensitively, and we are committed to ensuring that no employee who reports a corruption concern in good faith suffers any detrimental effect for doing so. We also require our Supply Chain Members and other associates to report any malpractice to us.

O'Keefe will take disciplinary action against employees who breach this policy or related procedures. We will take appropriate action with ~~its~~ Supply Chain Members or other associates who breach this policy or related procedures.

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**Continual Improvement**

We are committed to ethically operating the business with integrity & professionalism, this in turn allows us to achieve our business goals and retain our good reputation.

We will communicate this policy to our employees, supply chain and relevant interested parties, and we will review it periodically.

**Authorised by:**



**Marc Daly**  
Managing Director  
November 2023