

# Dalata Hotel Group

---

## Code of Conduct

## Contents

Message from CEO .....	2
About this Code of Conduct.....	3
Our Culture .....	4
Our Values .....	4
Our People.....	4
Our Fairness .....	4
Our Service.....	4
Our Individuality.....	4
Dalata Responsible Business Policy .....	5
Our Board of Directors .....	6
Speak Up .....	6
Attitudes and Behaviour .....	7
Accountability .....	7
Honesty and Integrity .....	7
Respect for the Law .....	7
Easy to do Business.....	7
Our People .....	8
Your Opinion Matters .....	8
Developing our People .....	8
Diversity & Equal Opportunities .....	8
Dignity in the Workplace .....	9
Safe & Healthy Work Environment .....	10
Our Business .....	11
Privacy.....	11
Information Security .....	12
Record Keeping .....	13
Fair Marketing.....	13
Social Media.....	14
Anti-Bribery & Corruption .....	15
Labour Practices .....	15
Human Rights & Modern Slavery .....	16
Theft and Fraud .....	17
Insider Dealing .....	18
Competition and Consumer Protection .....	18
Conflicts of Interest .....	19

## Message from CEO

Message from our CEO, Dermot Crowley;

Dear Colleague,

We are proud to be a people business; our company is people orientated, and through our hospitality we help our customers and guests create memories in our hotels.

Our company ethos is to be successful, "conduct our business ethically, 'do the right thing', and behave according to our core values\*. We outline these in the following pages.

The code of conduct outlines the standards of behaviour expected from our employees and others who represent the Company when dealing with all of our stakeholders, including our customers, colleagues, suppliers, banks, landlords, shareholders and the communities in which we live and work. Of course, it doesn't cover every scenario, but I hope that it will, in a simple way, emphasise our core values and guide you on how to approach any given situation.

It follows, too, that if you observe behaviour that does not match the standards we set for ourselves, you have an obligation to say so. You can speak with your line manager, a trusted colleague, or you can raise your concern through the confidential email address [speakup@dalatahotelgroup.com](mailto:speakup@dalatahotelgroup.com).



---

DERMOT CROWLEY

### **About this Code of Conduct**

This code of conduct sets out the main business principles and behaviours we in Dalata apply in our daily business activities. Team members are expected to be aware of and comply with these principles and behaviours, regardless of their position in the Company. By doing so, we support Dalata's business culture and our values.

The code of conduct is not intended to be a comprehensive summary of our operating policies and procedures. Like all businesses, detailed SOP's, policies, and procedures are in place to provide specific guidance across a broad range of business matters. If you are in any doubt on how to proceed, don't hesitate to contact your manager, General Manager or Central Office for detailed advice on a specific topic.

## **Our Culture**

Our culture drives everything we do in Dalata. It is based on our values of fairness, people, service and individuality and is about, essentially, "doing the right thing". We strive for excellence and performance in our business, but not at any cost.

It allows our people to contribute their individual talents to grow; and manage a successful, sustainable and environmentally-friendly business. We operate a flat management structure and have an open-door policy.

Our culture emanates from within our teams and is driven by how our people behave. We encourage you to be warm, welcoming, friendly, approachable and positive in your behaviour to demonstrate and live the Dalata values.

## **Our Values**

In Dalata, we pride ourselves on living and working by our values. These are ingrained into our Company and how we treat each other and our stakeholders, regardless of their background.

The core values which drive the culture within Dalata are outlined below;

### **Our People**

Dalata is the place where you can do great things – individually and as a team. You will have the opportunity to develop your talent, be recognised and rewarded for your commitment and pursue a fulfilling career.

### **Our Fairness**

We pride ourselves on creating an objective, supportive and fair working environment for our employees, the people we deal with and the communities we work within.

### **Our Service**

We ensure our service standards are consistently high at every opportunity. We strive for success, are enthusiastic about what we do and take responsibility for getting things right.

### **Our Individuality**

Our people are as individual as our hotels. They bring their own personality, character and enthusiasm, ensuring the experience we provide is always warm, welcoming, genuine and friendly.

## Dalata Responsible Business Policy

Dalata Hotel Group is committed to supporting our people, protecting our planet, and engaging with our customers, supply chain and the communities we work in to make a positive difference.

We understand that Dalata can have a lasting impact on the environment, the communities we operate in, and on our stakeholders. As Ireland's largest & UK's fastest-growing hotel operator, Dalata is committed to ethical business behaviour and taking responsibility for our group's impact.

We will do this by developing a sustainable business that respects the interests of our wider stakeholders: our employees, guests, investors, customers, suppliers and communities. We set out to apply the same standard of behaviour in the boardroom, in each of our hotels and in central office.

We apply the Responsible Business principles of Integrity, Inclusivity, Courage, Legacy, Stewardship and Transparency, with a commitment in all areas of our business to effectively manage and continuously improve our impact on the environment and society.

As part of our commitment to our stakeholders, we have identified the following Three Responsible Business Pillars as material to our commitment to responsible business practice.

Investing in people	Protecting our planet	Impact/Value to society
<p>We understand that our people are our most important asset and we are committed to making Dalata a fulfilling and inclusive place to work.</p> <p>We will achieve this through focusing on Diversity &amp; Inclusion, Career Development, Employee Wellbeing and Health &amp; Safety</p>	<p>We have a pro-active approach to managing our environmental obligations through our 'Living Green' programme.</p> <p>As the business grows and our geographical footprint expands, we remain committed to managing our environmental responsibilities effectively.</p> <p>Our focus areas are in Carbon &amp; Energy, Water, Waste, Sustainable Infrastructure and Biodiversity</p>	<p>As a hospitality company with operations across many locations, Dalata aims to be a responsible business that takes an active role in the communities in which we operate and the customers we serve.</p> <p>Our focus will be enabling sustainable experiences, managing a responsible supply chain, engaging local communities and supporting good causes.</p>

We will commit resources in pursuit of the following objectives;

- to minimise the use of energy, fuel, water, and the generation of waste, carbon and other emissions throughout our brands and partner hotels;
- to establish a sustainability framework approved by the board to guide our work, prioritise the topics and initiatives of most significant impact and provide the basis for ongoing review;
- to attain the gold standard set by Green Tourism at all of our properties;
- to ensure compliance with all relevant environmental, health & safety and social regulations and legislation;
- to create an inclusive workplace, where diversity is embraced and valued and where all of our workforce can contribute and thrive;
- to adopt efficient and responsible business practices;
- to promote biodiversity and strive to prevent pollution and other negative social impacts;
- to maintain excellent labour practices and ensure the health, safety, privacy and wellbeing of our workforce, guests and all others we do business with;
- to promote the development of environmental and social responsibility in our communities and create a positive social impact
- to treat all stakeholders, with fairness, equality and respect at all times, in particular stakeholders with special requirements and needs.

## **Our Board of Directors**

The Company has an experienced board of directors committed to the growth and progress of Dalata while always keeping the legal requirements of operating a public company at the forefront. The board is responsible for the company's governance, and the decisions made at board level impact you, the employee. The board adopts the UK corporate governance code in line with best practices applied by Irish and UK listed companies.

For more information, please see our annual report which is published on our website.

## **Speak Up**

Dalata is committed to encouraging an environment of openness. We aim to conduct our business with honesty and integrity. We have done this by establishing a process to enable you to raise a concern in confidence. If you are witness to, or have knowledge of, any harmful behaviour or business practice affecting a member of our team, our customers, or our reputation, please speak up.

Usually, you would raise a concern with your HR Manager or General Manager. However, if you feel uncomfortable speaking up locally, you can raise your concern through the confidential email address [speakup@dalatahotelgroup.com](mailto:speakup@dalatahotelgroup.com).

The people responsible for this email inbox are the Head of HR, the Employee Relations Manager and the Company Secretary. All information held by this inbox is kept strictly confidential.

For further information, please refer to our protected disclosure policy and procedure documents.

## Attitudes and Behaviour

### Accountability

You will be held accountable for your work, attitude and behaviour whilst representing the Company and must act within the law and comply with company policy. In Dalata, we promote a positive environment for our people. In a healthy culture, we accept that mistakes happen, so when we get it wrong, we hold our hand up and sort it out.

We understand that as individuals, teams and as a company, we grow when we recognise and learn from our mistakes. We encourage you to be proud of what you produce in work and be confident enough to admit any mistakes and learn from them.

### Honesty and Integrity

When dealing with your colleagues, our customers, suppliers, investors, and all our other stakeholders, you are responsible for being honest and acting with integrity. The reputation of the Company, our brands and our individual hotels depends on each of us upholding these behaviours.

### Respect for the Law

'It' 's never okay to work outside the law. If you are ever in doubt, ask your manager. Our company ethos is to act within the law. Always. The Company and the services we provide are subject to various laws and regulations depending on the countries and jurisdictions we operate within.

We employ specially trained staff and implement systems to make sure we comply with employment, accounting and tax law and regulations and provide training to employees in a variety of other areas to protect them, their colleagues and all who visit our hotels.

### Easy to do Business

At Dalata, we are always seeking new ways we can facilitate our customers and ensure they have the best possible experience in their dealings with us; this ought to be visible from top to bottom in the Company.

We want our guests to be comfortable from the moment they arrive right through until their departure. How employees deal with concerns that arise is pivotal to this aim. If a guest is troubled by the actions of another guest, an employee or a third party, the company and hotel management will act expeditiously in resolving the dispute.

#### Example

I overheard a guest telling a member from their group that their room was too hot and that the radiator seemed to be stuck on the highest setting?  
What should I do?

#### Advice

Approach the group and ask them if they are enjoying their stay? If the guest tells you about the matter, act accordingly and inform the Duty Manager of the issue to allow them to act and resolve the matter.



## **Our People**

We pride ourselves on the great people who work in Dalata and deliver hospitality to our customers and guests daily. We hire great people of varying abilities with diverse characteristics and develop them further within Dalata. In the following sections, we set out what we can offer you as a Dalata employee and, in turn, what we expect from our employees.

### **Your Opinion Matters**

In Dalata, we encourage two-way communication and sharing of regular feedback. We operate an open-door policy where regular communication is fostered between your line manager and HR Manager. All communication between colleagues should be undertaken respectfully and professionally.

### **Developing our People**

In Dalata, we are committed to helping our employees reach their full potential and develop their careers in the hospitality industry. We have a range of opportunities for both new and current staff to develop themselves and their career path. We actively encourage all employees to seek development opportunities by promoting our internally developed training programs and seeing more successful graduates each year.

Aligning with our value of Fairness, we ensure the process surrounding the selection for promotion and development is conducted with transparency and objectivity based on work ethic, skills, attitude and the ability to do the job. All employees have access to all job vacancies across the whole group.

You can engage with your line manager or HR Manager and create a personal development plan to guide your progression within Dalata.

### **Diversity & Equal Opportunities**

Dalata embraces diversity at all levels in the organisation. We are committed to actively working for and providing an inclusive, harmonious and fair working environment, respecting human rights, with real and equal opportunities for all. No form of intimidation or discrimination is tolerated.

That means we welcome the inclusion of individuals with varying abilities and regardless of gender, age, nationality, colour, religion, socio-economic status, sexual orientation, or another distinguishing characteristic. This is closely linked with our core value of individuality, and we expect all employees to respect this principle. True inclusion is one where all employees feel valued, respected, and can contribute equally to achieving the aims of their department or hotel.

We expect that your behaviour should be respectful and inclusive to all and that any decisions or actions taken by you are based solely on the needs of the business and aligned to our company values and ethos.

**Example**

We are currently celebrating PRIDE in the hotel, and the HR Manager is encouraging us to be proud of our individuality. However, I noticed one of my colleagues commented on a social media post relating to pride in a derogatory manner towards members associated with the LGBTQ+ community. My best friend is gay, and I find the comment insulting. What should I do?

**Advice**

We do not condone any form of discriminatory behaviour. You should make your line manager or HR Manager aware of the post as they will have the ability to deal with the situation appropriately

## Dignity in the Workplace

Treat everyone you meet throughout your employment with dignity and respect. Everyone who works at Dalata must be free to do their job without fear of intimidation or harm. We have a detailed policy on bullying and harassment, and all employees are expected to be familiar with and uphold the letter and the spirit of this policy.

Some examples of unacceptable behaviour in this regard include the following;

- Using physical or verbal abuse or threats to anyone in the business
- Sharing offensive, derogatory or sexually explicit materials by any communication tool including email, text services, WhatsApp, the internet or any social media channel
- Making offensive or derogatory jokes or comments - be mindful that your humour may not be perceived as humour to someone else and could cause offence
- Engaging in sexual or physical harassment or bullying
- Harassment or discriminatory comments, acts or behaviours against a colleague, guest or patron of the Company in person or using any digital or virtual communication channels.

If you feel or see any activity that causes concern, then take positive action. For example, we can support each other by pointing out to a colleague something done or said that crosses the line, by showing leadership – making it clear that bullying and harassment are never acceptable in your team, or by supporting a colleague you suspect may be the subject of bullying or harassment.

Where you see what you believe is bullying or harassment, contact someone in a managerial role to deal with the matter. Both informal and formal grievance processes are available to all employees, and no repercussion will follow anyone who reports a genuine concern.

It is important that you are respectful to everyone you come into contact with while at work. It takes a team effort for a positive working environment first to take hold and subsequently remain intact.

Please refer to the Company Dignity at Work - Bullying and Harassment Policy and Social Media Policy for more information.

## Safe & Healthy Work Environment

Everyone has a responsibility for safety in our workplace. If you come across any potential hazards, please address the hazard if you are competent and it is safe to do so. If you are unable to control the risk, please highlight it to management immediately. Every incident or near miss should be reported to your management team. Each team member is responsible for complying with all health and safety legislation relevant to their jurisdiction.

Our people's safety is a priority for Dalata. We conduct our business in a safe working environment for both our people and our customers. Our teams are provided with the training, information and resources required to maintain a safe working environment for all.

You can find more information in our Health and Safety policy.

We hope that you feel comfortable talking about any worries or problems you may have with your line manager or another responsible person at work. However, we realise that speaking out can be difficult. If you prefer, our confidential email address can be used in this instance, [speakup@dalatahotelgroup.com](mailto:speakup@dalatahotelgroup.com)

### Example

I have noticed that the handle on the fire door in the back corridor of the hotel is broken. What should I do?

### Advice

Each employee has a responsibility to report any health and safety risks they might see in their hotel. You should report this to the manager on duty, and they then have a responsibility to follow up on the possible repairs that may be needed. Therefore, it is important that if you see a risk, you report it immediately.

### Example

I saw a Kitchen team member not completing the correct cleaning procedure and not adhering to the HACCP standards, but I 'didn't feel confident to challenge them or tell my line manager. What should I do?

### Advice

We hope that you feel comfortable talking about any worries or problems you may have with your line manager or another responsible person at work. However, we realise that speaking out can be difficult. If you prefer, our confidential email address can be used in this instance, [speakup@dalatahotelgroup.com](mailto:speakup@dalatahotelgroup.com)

## Our Business

### Privacy

Treat every person's privacy and personal information as you would a sum of money if they asked you to keep it safe for them.

As hoteliers, we collect, process, and store the personal information of guests, employees, and others according to the law to provide excellent service to our guests and provide our colleagues with a great experience working for Dalata.

The General Data Protection Regulation (GDPR) is a complex legal framework. Dalata has developed policies, procedures, and monitoring of our compliance designed to protect the Company, you as you do your work, and our guests, colleagues, and other data subjects.

Data protection training is mandatory for all employees, and help is at hand, in-house, for any questions you have on data protection. Simply email [dataprotection@dalatahotelgroup.com](mailto:dataprotection@dalatahotelgroup.com). The company secretarial team manages this email. Alternatively, call Central Office (+353 (1) 206 9400) to speak with someone in Company Secretarial.

Despite its complexities, the GDPR is based on straightforward principles of accountability. As a company, we are legally responsible and must demonstrate compliance with these principles:

- Lawfulness: we only process personal data for a specific lawful purpose; we are transparent and fair, explaining the purpose to subjects clearly and truthfully and with their agreement.
- Purpose limitations: we process personal data for the specific purpose stated and not for other reasons.
- Data Minimisation: if we don't need it, we don't collect it. 'Nice to have' is not a need!
- Data Accuracy: we make sure personal data is up-to-date and accurate.
- Storage Limitation: when we don't need it anymore, we securely delete or destroy it
- Integrity: we keep it safe and secure.

We encourage you to memorise these principles as a guide to the right behaviour concerning privacy and personal information.

Please refer to the Dalata Privacy Policy for more information.

#### Example

On check in, how do I confirm a guest's personnel details without unintentionally sharing the guest's information with other guests or patrons who may be in earshot of our conversation?

#### Advice

When checking in a guest, present the guest with their registration card and ask them to review the details as presented on the registration card and write any amendments required.

## Information Security

Never share confidential information you receive in your work, either publicly or privately, without appropriate permission.

If your job involves processing data electronically, using any of the company's information and communication technology applications, always follow Dalata's Information Security Policy.

All employees are obliged to undertake Information Security Policy training upon joining the company and refresh this training annually.

Breaches of information security can and do occur; these are ordinarily unintentional. If you make a mistake that causes an information security breach, have a near-miss, or see such a mistake or near-miss, however trivial, you are duty-bound to report it. Your experience may provide valuable information to prevent a similar incident from occurring in the future.

To report a data breach or near miss, email [dataprotection@dalatahotelgroup.com](mailto:dataprotection@dalatahotelgroup.com). The company secretarial team manages this email. Alternatively, call Central Office (+353 (1) 206 9400) and ask to speak to speak with someone in Company Secretarial.

Please refer to the Dalata Information Security Policy for more information.

### Example

I have lost my laptop while travelling.  
What should I do?

### Advice

You may have stored sensitive information on your laptop. This may be personal data e.g. team members dates of birth on a birthday listing, employee contact details or more detailed spreadsheets, and it is important that it does not fall into the wrong hands. So please ensure that you inform your line manager and, in any event, you must report your lost laptop to the Group IT department immediately.

## Record Keeping

You must be honest, transparent and accurate in your record keeping. Keeping accurate and up-to-date records is essential for the smooth and efficient running of the business. This illustrates how we are performing as a company and is also a legal requirement.

Every day we generate records of what is happening in the hotels and Central Office. These can include but are not limited to, employee timekeeping and hours worked, guest check-ins and check-outs, records of financial transactions, orders and deliveries etc.

A range of hotel departments and Central Office functions have specific responsibilities concerning records and reporting.

However, it is essential that all employees recognise their responsibilities in creating and maintaining accurate records. If an employee identifies a record that may be false or inaccurate, they must discuss this with their manager or contact the confidential helpline at [speakup@dalatahotelgroup.com](mailto:speakup@dalatahotelgroup.com).

These records are an element of the 'Company' 's system of internal controls and are subject to audit and testing. Failure to maintain accurate records could leave the company open to potential external review and sanction. Producing false records may lead the responsible employee(s) facing disciplinary action.

### Example

My work colleague has asked me to clock in for him when he is not at work.  
What should I do?

### Advice

Decline to clock in for your work colleague and raise this with your direct line manager or HR Manager; they will be equipped with the skills to deal with the situation.

## Fair Marketing

Any factual information about the Company that you share must be substantiated and must not be misleading. In line with our values, we are committed to being fair, transparent and accurate in our communications to both our colleagues and customers. You should never intentionally create a situation where expectations cannot be met, thus creating a knock-on effect on customer satisfaction and ultimately weakening our brands. All employees who are authorised to communicate on behalf of the Company must comply with the relevant legislation.

## Social Media

You must act respectfully and responsibly when using social media, being mindful that your actions online do not adversely affect the reputation and performance of yourself, that of someone else, or that of the Company. Therefore, we ask that our employees always consider the interests of others and the Company when posting from their own social media account.

Our Social Media Policy goes into considerable detail on all aspects of the permissible use of online platforms. Generally speaking, what you do on your own time is a matter for yourself.

Please consult with your HR Manager if you have any particular concerns regarding a post you have made, want to make or have seen from one of your colleagues.

You must not use company social media accounts without authorisation to do so. Only those who have been cleared to use these platforms must do so. In addition, only authorised personnel may respond to any social media post on behalf of the Company. Should you be made aware of a post that you feel is inappropriate, please contact your line manager.

Please refer to our Social Media Policy for more information.

### Example

I saw a post on social media by a colleague detailing a conversation she overheard between two guests. Her place of work is visible on the same.

### Advice

Report this to management – it is vital that we protect guests' privacy, detailed in our Social Media Policy.

### Anti-Bribery & Corruption

Bribery will not be tolerated in any situation, either to gain an unfair advantage in securing commercial gain or to be in receipt of financial or non-financial gains.

It is essential that you do not partake in behaviours or conduct that contradict our company value of Fairness and can damage the company's reputation. It is vital for every staff member to understand the dangers of bribery and corruption and be familiar with the situations in which it can arise.

Please refer to the Anti-bribery and Corruption Policy for more information.

#### Example

Is it okay to accept tips from a guest for my services?

#### Advice

Yes, it is okay to accept a tip from a guest; however, it is not okay to accept cash (cash equivalent) or a gift from a guest with the view that this would gain them or their Company a more favourable service or position.

### Labour Practices

Labour practices are one of our fundamental strengths in Dalata. We operate a best practice approach and comply with all labour laws in the jurisdictions we operate in. For example, we provide employee documentation ahead of time, deal with employee grievances effectively, and provide extensive training and support for employees in key areas such as health and safety and human rights. Our compliance rate is over 95% across the group, which shows our emphasis on maintaining excellent labour practices.



## Human Rights & Modern Slavery

Dalata will not tolerate modern slavery in its business dealings with employees, suppliers or contractors.

We strive to act ethically with integrity, honesty and professionalism in all aspects of our business. Modern slavery is defined by the Modern Slavery Act as “slavery, servitude and forced or compulsory labour” and “human trafficking”.

We are committed to ensuring that these practices do not exist, both within our own recruitment practices and within our suppliers and supply chains. If you are concerned about any wrongdoing in this area, please report it to your line manager or contact our confidential email address [speakup@dalatahotelgroup.com](mailto:speakup@dalatahotelgroup.com).

Please refer to our Human Rights Policy or Modern Slavery policy for further details.

### Example

I read an article that might implicate one of our suppliers in an instance of human trafficking. What should I do?

### Advice

Report this issue to management as soon as possible – it is vital that we report all possible instances of Modern Slavery to eradicate the issue as best as possible.

### Example

When speaking to a colleague who is employed by an agency, they mentioned that they had to pay a monthly fee to work with the agency. I don't feel this is right, what should I do?

### Advice

Report this issue to management as soon as possible who will be better placed to deal with this matter.

## Theft and Fraud

In Dalata, we all work together to operate a successful business. It is important that we also work to protect the Company against fraud or theft. Dalata has policies and procedures to protect our people, property, and finances, and we will take any breach of these procedures very seriously.

Examples of theft and fraud include misappropriation of funds, taking money from the cash register, claiming untrue expenses, paying unapproved bonuses, taking company property, removal/consumption of stock, false accounting or unauthorised sharing of intellectual property, but it does extend beyond these examples.

In any counts of the above, it damages the hard work of others to protect, improve and grow our business. If you believe that elements of theft or fraud are taking place, speak with your direct line manager or HR Manager where appropriate or contact our confidential email address [speakup@dalatahotelgroup.com](mailto:speakup@dalatahotelgroup.com).

Dalata will manage any reports of theft and fraud in line with our policies and procedures and escalate to the relevant authorities should that be necessary.

### Example

I have noticed that petty cash in the hotel is being used incorrectly. I do not think the hotel is following correct accounting procedures. What should I do?

### Advice

You should speak directly with your HR manager or your General Manager. If these options are not appropriate, you can contact our confidential email address [speakup@dalatahotelgroup.com](mailto:speakup@dalatahotelgroup.com). Your concern will be treated with the

## **Insider Dealing**

Never buy or sell shares in Dalata if you are in possession of inside information.

Dalata is public Company. Any member of the public, or any employee, may buy and sell shares in the Company. Dalata provides a 'Save as you Earn' (SAYE) sharesave scheme to promote employee ownership and encourages everyone to participate.

However, trading in shares of a public company comes with certain responsibilities and it is a criminal offence to buy or sell shares in any company when in possession of inside information. This is known as insider dealing (or insider trading).

Inside information is – in simple terms- any information that would be likely to have a significant effect on the share price if it were made public.

Every employee receives a copy of the Inside Information Policy and the All-Employee Market Abuse Regime Policy (MAR Policy), and essential training is available for all employees. Moreover, we actively encourage any employee with a question concerning inside information (or buying or selling shares) to contact the Company Secretary (phone +353 (1) 206 9400) or email [companysecretarial@dalatahotelgroup.com](mailto:companysecretarial@dalatahotelgroup.com)

Please refer to the Dalata Inside Information Policy and the All-Employee Market Abuse Regime Policy (MAR Policy)

## **Competition and Consumer Protection**

Never engage in illegal anti-competitive behaviour.

Competition law prohibits businesses from entering into anti-competitive agreements or concerted practices with others. Illegal anti-competitive behaviour includes, participating in a cartel, abuse of a dominant position and other potentially anti-competitive agreements.

A cartel agreement does not have to be in writing, nor does it even have to have been carried out. Simply making a cartel agreement is illegal. The following are examples of a cartel:

- an agreement between competitors to fix prices for goods and services, including an agreement with competitors on discounts;
- market-sharing, where competitors divide up locations or customers among themselves;
- controlling the amount of goods or services being supplied in order to keep prices higher;
- rigging bids among competitors in order to guarantee that one person or Company in particular wins the contract.

## Conflicts of Interest

Conflicts of interest can occur. If you are responsible for making a decision in your work and have (or think that you may have) a conflict of interest, you must contact your manager to discuss it and agree the appropriate course of action.

A conflict of interest is a situation in which a person or organization is involved in multiple interests, financial or otherwise, and serving one interest could involve working against another. If making the right choice for the Company could work against your own interest or that of a person or organisation you are connected to, then you have a conflict of interest.

A conflict of interest can commonly occur in relation to hiring or purchasing decisions on behalf of the Company.

### Example

My brother-in-law has started his own printing company and I know he can print our internal posters cheaper than our current contractor but he must be paid via petty cash. Should I use him to save the Company money?

### Advice

The Company has a process for selecting and procuring services from contractors which must be ran through the appropriate channels for approval. All contractors who wish to tender for our business must complete the application process and business will be awarded fairly. If in doubt speak to your manager who can give you guidance on this.

