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Q2 FY27

Ethical Code of Practice Pack

Connect Install Ltd

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Introduction

Purpose of the Ethical Code of Practice Pack

This Ethical Code of Practice Pack sets out the principles, policies, and standards that guide Connect Install Limited in conducting its business ethically, responsibly, and in compliance with all applicable legal and regulatory requirements.

The purpose of this pack is to promote integrity, ensure compliance, prevent unethical conduct, protect human rights, support sustainability, and provide guidance to employees and stakeholders.

Scope

This Code applies to all employees, directors, contractors, suppliers, and third parties acting on behalf of the Company.

Governance & Oversight

The Board of Directors provides oversight, while Management implements policies and ensures compliance.

- I. Training & Awareness: Training is provided at induction and periodically thereafter.
- II. Breach & Enforcement: Breaches may result in disciplinary action, termination, or legal reporting.
- III. Policy Review & Approval: Policies are reviewed annually and approved by the Board.
- IV. Version Control Statement: All documents are version controlled and archived for audit purposes.

Section 1- Core Ethical Governance

Code of Conduct & Ethics Policy

Purpose

This policy establishes the ethical standards, professional behaviour, and integrity principles expected from all employees and representatives of the organisation. It ensures that business activities are conducted ethically, responsibly, and in compliance with applicable laws and regulations.

Scope

This Code of Conduct applies to all staff, contractors, and subcontractors engaged in business activities. It outlines expected standards of behaviour in line with Irish business ethics, health & safety, and employment law. The objectives are to ensure honesty, fairness, and professionalism in all dealings; maintain compliance with Irish legal and regulatory standards; and promote safety, sustainability, and respect for clients and colleagues.

Ethical Principles and Standards

1) Integrity and Honest Conduct

Employees must act honestly, transparently, and responsibly in all professional activities. Decisions should be made in the best interest of the organisation and its stakeholders.

2) Compliance with Laws and Regulations

All employees must comply with applicable laws, regulations, and internal policies in every location where the organization operates with Irish law, including:

- Safety, Health, and Welfare at Work Act 2005
- Employment Equality Acts 1998–2015
- Data Protection Acts 2018 (GDPR)
- Criminal Justice (Corruption Offences) Act 2018
- Companies Act 2014
- Hold and maintain all required licenses, insurance, and professional certifications, and never engage in illegal, misleading, or unethical conduct.
- Respectful and Inclusive Workplace
- The organisation is committed to maintaining a workplace that is:
 - respectful
 - inclusive
 - free from discrimination and harassment

All employees must treat colleagues, clients, and partners with dignity and professionalism. Please reference policies located in the Policies under Diversity, Equity & Inclusion section in chapter 2 of the employee handbook.

Conflicts of Interest

Employees must avoid situations where personal interests could interfere with business decisions.

Potential conflicts must be disclosed to management so that appropriate measures can be taken. (see conflict of interest policy in the employee handbook)

Examples include:

- fiscal interests in suppliers or competitors
- outside employment that affects work duties
- personal relationships influencing business decisions.

Anti-Bribery and Corruption

Employees must not offer, give, request, or accept bribes or improper advantages.

Business decisions must never be influenced by inappropriate gifts, payments, or benefits.

Do not accept gifts or hospitality that may compromise objectivity (all gifts must be declared via gift form - Connecteam).

Confidentiality and Information Protection

Employees must protect confidential information belonging to:

- the organisation
- clients
- suppliers
- employees

Confidential information must not be disclosed without proper authorization.

- Fair Business Practices
- The organization is committed to fair competition and ethical business relationships with customers, suppliers, partners, and regulators.
- Employees must avoid deceptive or unfair practices.

Reporting Ethical Concerns

Employees are encouraged to report any suspected:

- unethical conduct
- violations of this policy
- illegal activities

Reports can be made through management or designated reporting channels.

The organisation prohibits retaliation against individuals who report concerns in good faith.

Health, Safety, and Environment

Comply fully with company Health & Safety Management System and site safety requirements. Report hazards or near misses immediately. Use all protective equipment safely. Ensure installations meet or exceed regulatory standards. Minimise environmental impact and follow best practice guidelines.

Data Protection and Confidentiality

Oversee all data in accordance with the Data Protection Act 2018 (GDPR). Do not share client or company information without authorisation. Use company IT systems responsibly and protect proprietary materials.

Company Property and Resources

Use company tools, vehicles, and equipment responsibly and only for work purposes. Report any damage or misuse immediately. Respect intellectual property rights and confidentiality agreements.

Responsibilities

Employees must:

- comply with this policy/all company policies.
- behave ethically and responsibly.
- report potential violations.

Management must:

- lead by example
- promote ethical culture.
- ensure employees understand the policy.

Violations

- Failure to comply with this policy may result in disciplinary action, including termination of employment and possible legal consequences.

Review and Updates

This policy will be reviewed annually or upon:

- Legislative or governance changes.
- Recommendations from auditors, regulators, or legal advisers.
- Any amendments must be approved by the Board and communicated to all directors.
- Communicated to employees and, where appropriate, to contractors, suppliers, and other business partners.

Approval and Ownership

Role	Responsibility
Framework Owner	Risk & Compliance Lead (Human Resources Manager)
Approved By	Board / Executive Leadership
Review Frequency	Annual
Effective Date	Q2 FY27
Version	1.0

Conflicts of Interest Policy

Introduction

The relationship of Connect Install and its employees is based on mutual trust. In general, therefore, an employee should refrain from allowing their personal and/or financial activities from coming into opposition with the interests and integrity of the Company and thus placing it at a disadvantage. Where this does happen is known as a conflict of interest. Conflicts of interest between an organisation and its employees can arise in many circumstances and it is not possible to provide a single definition.

Purpose

This policy aims to effectively manage potential conflicts of interest, be they real or perceived. The policy aims to support all those within the scope of the policy while also recognising the need to protect Connect Install against conflicts of interest that may be damaging to its activities and or reputation.

Scope

This policy applies to all employees, partners, contractors, and any other third-party person related to Connect Install. This Policy applies whenever an individual recognises, or should recognise, that a conflict of interest may arise from their current or future activities.

Conflicts of Interest Policy

Where an employee is aware of a conflict of interest, real or perceived they, as a matter of urgency, should raise the issue with their immediate manager so that corrective action may be taken before actual damage is done.

The responsibility for resolving any conflict of interest lies with the immediate manager — although it may later involve senior management.

The Company will attempt to resolve any conflicts of interest as fairly and as reasonably as possible. If no resolution can be found, the last action to be taken will rest with senior management. If a conflict of interest is deliberately concealed by an employee or if no solution to one can be found, the Company may invoke disciplinary action that could lead to the employee's dismissal.

Review and Updates

This policy will be reviewed annually or upon:

- Legislative or governance changes.
- Recommendations from auditors, regulators, or legal advisers.
- Any amendments must be approved by the Board and communicated to all directors.
- Communicated to employees and, where appropriate, to contractors, suppliers, and other business partners.

Approval and Ownership

Role	Responsibility
Framework Owner	Risk & Compliance Lead (Human Resources Manager)
Approved By	Board / Executive Leadership
Review Frequency	Annual
Effective Date	Q2 FY27
Version	1.0

Whistleblowing (Protected Disclosures) Policy & Procedure

Purpose

The purpose of this policy is to provide a clear, safe, and confidential process for employees and other workers to raise concerns about suspected wrongdoing within Connect Install.

The company is committed to maintaining an ethical, lawful, and transparent working environment. This policy ensures compliance with the Protected Disclosures Act 2014 and the Protected Disclosures (Amendment) Act 2022, which protect workers who report relevant wrongdoing from penalisation or retaliation.

Workers who make disclosures in good faith will be supported and protected under this policy.

Scope

This policy applies to:

- All employees
- Contractors and subcontractors
- Consultants
- Suppliers
- Any person performing work-related services for or on behalf of Connect Install

It covers disclosures relating to wrongdoing within the company, by employees, or by third parties associated with the company.

What is Whistleblowing / a Protected Disclosure

Whistleblowing is the practice of reporting suspected wrongdoing or malpractice within an organisation.

A Protected Disclosure is a disclosure of information that:

- I. The worker believes shows wrongdoing, and
- II. Is made in the public interest through appropriate reporting channels.
- III. The wrongdoing may relate to actions that have occurred, are occurring, or are likely to occur in the future.

Examples of Relevant Wrongdoing

Examples of wrongdoing that may be reported under this policy include (but are not limited to):

- Criminal offences (e.g. theft, fraud, corruption, bribery)
- Failure to comply with a legal obligation.
- Injustice
- Endangerment of health and safety
- Environmental damage
- Misuse or mismanagement of funds
- Serious breach of company policy or ethical standards
- Concealment or destruction of evidence relating to any of the above

These matters will always be taken seriously and investigated appropriately.

Matters Not Covered by This Policy

This policy is not intended to replace existing procedures for personal employment matters.

The following should be raised through the appropriate company procedures:

- Complaints about terms and conditions of employment
- Personal grievances or workplace disputes
- Bullying or harassment complaints
- Discrimination complaints
- Issues relating to termination of employment.

These matters should be addressed through the Grievance Procedure or Dignity and Respect Policy unless they involve retaliation for whistleblowing.

Key Principles

- I. **Confidentiality** - All disclosures will be managed confidentially. The identity of the person making the disclosure will be protected as far as possible.
- II. **Protection from Retaliation** - Workers will not suffer dismissal, disciplinary action, intimidation, or any other detriment for making a disclosure in good faith.
- III. **Fairness** - All parties involved in a disclosure or investigation will be treated fairly and impartially.
- IV. **Transparency** - The company will respond to credible disclosures promptly and appropriately.

Making a Disclosure

Disclosures should be made as soon as possible after the information becomes known.

Internal Reporting

In the first instance, concerns should be reported to the: Protected Disclosures Officer (PDO) - Human Resources Manager

Reports may be made:

- In writing (email or letter marked “Strictly Confidential – Protected Disclosure”)
- Verbally through a confidential meeting
- Through any secure reporting channel designated by the company
- To assist the investigation, the disclosure should include:
 - The nature of the wrongdoing
 - Relevant dates and locations
 - Names or roles of persons involved.
 - Any available evidence
 - Contact details of the person making the disclosure (unless anonymous)

Anonymous disclosures will be accepted and assessed, though they may be more difficult to investigate.

Procedure After a Disclosure

Acknowledgement:

The company will acknowledge receipt of a disclosure within 7 days where possible.

Initial Assessment:

A preliminary assessment will determine whether:

- The disclosure falls within the scope of the Protected Disclosures Act

- Further investigation is required.

Investigation:

Where appropriate:

- The Protected Disclosures Officer will investigate the matter, or
- An independent investigator may be appointed.

The whistleblower will be kept informed of progress where possible, subject to confidentiality and legal obligations.

The aim is to provide feedback within 90 days of acknowledgement.

Confidentiality and Data Protection

The company will ensure that:

- The identity of the whistleblower is not disclosed without consent unless required by law.
- Information relating to disclosures is securely stored.
- Access is restricted to authorised personnel only.
- All information will be processed in accordance with the Data Protection Act 2018 and GDPR.

Protection Against Penalisation

Under the Protected Disclosures Act, it is an offence to penalise or threaten a worker for making a protected disclosure.

Examples of penalisation include:

- Dismissal or demotion
- Withholding promotion or salary increases
- Harassment or intimidation
- Unfair negative performance reviews
- Exclusion from work opportunities or blacklisting
- Bullying, harassment, or any detrimental treatment towards a colleague who has made a disclosure is unacceptable.
- Any employee found to have retaliated against a whistleblower may face disciplinary action up to and including dismissal.

External Reporting Options

If a worker feels unable to report internally, or believes their concern has not been properly addressed, they may report to an external body.

Possible reporting channels include:

- Protected Disclosures Commissioner - Office of the Ombudsman
Website: www.ombudsman.ie
- Other prescribed bodies include:
- Health and Safety Authority (HSA) – workplace safety matters
- Revenue Commissioners – tax or financial misconduct
- Data Protection Commission (DPC) – data protection breaches
- An Garda Síochána – criminal offences

False or Malicious Reports

Deliberately false or malicious disclosures are not protected under the Act and may result in disciplinary action.

However, no action will be taken against individuals who make a genuine disclosure that later proves to be mistaken.

Training and Awareness

Connect Install will ensure that:

- Employees receive training on recognising and reporting wrongdoing.
- Managers and supervisors understand how to respond to disclosures.
- Awareness of this policy is promoted through induction and internal communications.

Record Keeping

The company will maintain secure records of:

- Disclosures received
- Investigations conducted
- Outcomes and actions taken.
- Records will be kept confidentially and retained for at least 5 years in compliance with data protection requirements.

Review and Updates

This policy will be reviewed annually or upon:

- Legislative or governance changes.
- Recommendations from auditors, regulators, or legal advisers.
- Any amendments must be approved by the Board and communicated to all directors.
- Communicated to employees and, where appropriate, to contractors, suppliers, and other business partners.

Approval and Ownership

Role	Responsibility
Framework Owner	Risk & Compliance Lead (Human Resources Manager)
Approved By	Board / Executive Leadership
Review Frequency	Annual
Effective Date	Q2 FY27
Version	1.0

Section 2 - Financial & Legal Integrity

Anti-Bribery and Anti-Corruption Policy

Purpose

Connect Install Limited is committed to conducting all business honestly, ethically and in full compliance with applicable anti-bribery and anti-corruption laws.

The purpose of this policy is to set out the Company's zero-tolerance approach to bribery and corruption and to provide clear guidance to employees, contractors and business partners on the standards expected in all business dealings.

Connect Install Limited prohibits all forms of bribery and corruption, whether direct or indirect, and expects the same commitment from all persons acting on its behalf.

Scope

This policy applies to:

- All employees, directors, contractors, consultants, and subcontractors
- All business partners, suppliers, agents and other third parties acting on behalf of Connect Install Limited
- All transactions, contracts, and business dealings in Ireland and abroad
- This policy applies equally to dealings with both the public and private sectors.

Legal Framework

This policy is informed by relevant Irish legislation, including:

- Criminal Justice (Corruption Offences) Act 2018
- Criminal Justice (Theft and Fraud Offences) Act 2001
- Companies Act 2014
- Ethics in Public Office Act 1995, where applicable
- Breaches of anti-bribery and anti-corruption laws may result in criminal prosecution, fines, imprisonment, contract loss and serious reputational damage to both the individual and the Company.

Definitions

Bribery

Offering, promising, giving, requesting, or receiving anything of value to improperly influence a person's actions or decisions.

Corruption

The abuse of entrusted power, authority, or position for private gain.

Facilitation Payment

A small unofficial payment made to secure or expedite a routine action. Facilitation payments are prohibited.

Kickback

The return of part of a payment, contract sum, or financial benefit as a reward for securing an improper business advantage.

Policy Statement

Connect Install Limited prohibits:

- Offering, giving, requesting, or accepting any bribe or improper payment
- Providing gifts, hospitality, entertainment, donations, or other benefits intended to improperly influence a business decision.
- Facilitation payments of any kind, regardless of local custom or practice
- Kickbacks, secret commissions or concealed financial arrangements.
- Political or charitable contributions made for an improper purpose.
- The use of third parties to conceal, arrange or conduct bribery or corrupt conduct.
- Retaliation against any person who refuses to take part in, or reports, suspected bribery, or corruption.
- All employees and persons acting on behalf of the Company must act with honesty, integrity, fairness, and transparency in every business activity.

Gifts, Hospitality and Entertainment

Reasonable and proportionate gifts or hospitality may be permitted only where they:

- Are for a legitimate business purpose.
- Are not intended to improperly influence a decision or outcome.
- Are appropriate in value and frequency.
- Comply with this policy and any client or site-specific requirements.
- Cash or cash equivalents, including vouchers, must never be offered or accepted.
- All gifts and hospitality must be declared to management where a value above €50 recorded in the Gifts and Hospitality Register (SharePoint) by the Human Resources Manager.
- Excessive, lavish, or frequent hospitality is not permitted. Prior approval must be obtained for any significant or sensitive hospitality or entertainment.

Third-Party Relationships

Connect Install Limited will only engage with suppliers, contractors, consultants, agents, and business partners who demonstrate ethical business conduct.

The Company will take reasonable steps to ensure that third parties acting on its behalf comply with this policy and applicable laws. This may include:

- Conducting appropriate due diligence before engagement
- Including anti-bribery obligations in contracts where appropriate
- Verifying the legitimacy of payments and receiving accounts
- Ensuring that payments are transparent, properly documented and supported by valid records.

- Third parties must not be used to conduct any act that would be prohibited if undertaken directly by the Company or its employees.

Political and Charitable Contributions

- Connect Install Limited does not make political donations.
- Any charitable donation or sponsorship must be:
 - Approved by management
 - Made transparently and for a legitimate purpose
 - Properly recorded in the Company's records
- Charitable donations or sponsorships must never be used to obtain, retain, or influence business.

Responsibilities

Directors and Senior Management

Directors and senior management are responsible for:

- Promoting a culture of integrity and ethical business conduct
- Approving and supporting this policy
- Overseeing compliance and taking appropriate action where concerns arise

Managers

Managers are responsible for:

- Implementing this policy within their areas of responsibility
- Ensuring employees understand their obligations.
- Escalating concerns promptly and appropriately

Employees and Contractors

All employees and contractors must:

- Always comply with this policy.
- Avoid any conduct that could amount to bribery or corruption.
- Report actual or suspected misconduct immediately.
- Maintain accurate and complete records in relation to business expenses and transactions.

Human Resources Manager

The HRM is responsible for:

- Maintaining relevant registers and records
- Coordinating training and awareness
- Receiving and investigating reports of suspected misconduct
- Supporting ongoing monitoring and policy review

Due Diligence and Record Keeping

Connect Install Limited will maintain accurate and complete financial and business records.

Accordingly:

- All transactions and payments must be properly recorded.
- No secret, false or unrecorded accounts may be maintained.
- Expenses must be supported by valid receipts and approved in accordance with company procedures.
- Supplier vetting and due diligence records must be retained for an appropriate period, including a minimum of 7 years where required by company procedure or legal obligation.
- False, misleading, or incomplete records are prohibited.

Reporting Concerns

Any employee, contractor or business partner who becomes aware of actual or suspected bribery or corruption must report it immediately through one of the following channels:

- Their line manager
- The Human Resources Manager
- The Company's Protected Disclosures or Whistleblowing procedure

All reports will be treated confidentially as far as possible. No person will suffer retaliation, victimisation, or disadvantage for reporting a concern in good faith.

Training and Awareness

Connect Install Limited will provide appropriate anti-bribery and ethics training to relevant employees.

Training will be provided on induction and periodically thereafter. Additional guidance or role-specific training may be provided to employees working in higher-risk areas, including procurement, finance, commercial management and project delivery.

The Company will maintain clear communication of its zero-tolerance approach to bribery and corruption.

Breach of Policy

Any breach of this policy will be treated as a serious matter and may result in:

- Disciplinary action, up to and including dismissal.
- Termination of contractor, consultant, or supplier arrangements
- Referral to law enforcement or regulatory authorities where appropriate
- Legal action to recover losses or seek other remedies.

Review and Updates

This policy will be reviewed annually or upon:

- Legislative or governance changes.
- Recommendations from auditors, regulators, or legal advisers.
- Any amendments must be approved by the Board and communicated to all directors.

- Communicated to employees and, where appropriate, to contractors, suppliers, and other business partners.

Approval and Ownership

Role	Responsibility
Framework Owner	Risk & Compliance Lead (Human Resources Manager)
Approved By	Board / Executive Leadership
Review Frequency	Annual
Effective Date	Q2 FY27
Version	1.0

Anti-Money Laundering (AML) and Know Your Customer (KYC) Policy

Purpose

Connect Install Limited is committed to conducting its business with integrity and transparency and to preventing its operations from being used for money laundering, terrorist financing, or other forms of financial crime.

The purpose of this policy is to outline the procedures and controls the Company follows to identify potential financial crime risks, verify business relationships where appropriate, and report any suspicious activity in accordance with applicable Irish and EU legislation.

Scope

This policy applies to:

- All employees, directors, and management of Connect Install Limited
- Contractors, consultants, and subcontractors acting on behalf of the Company.
- Business relationships with customers, suppliers, and partners
- All financial transactions, including payments, transfers, refunds, and contractual arrangements.

Although Connect Install Limited operates primarily as an installation and contracting business and is not a financial institution, the Company will take reasonable and proportionate steps to ensure its operations are not used for unlawful financial activity.

Legal Framework

This policy is informed by relevant Irish and EU legislation including:

- Criminal Justice (Money Laundering and Terrorist Financing) Acts 2010–2021
- EU (Anti-Money Laundering: Beneficial Ownership of Corporate Entities) Regulations 2019
- Data Protection Act 2018 and the General Data Protection Regulation (GDPR)
- These laws establish obligations to prevent financial crime and require organisations to identify, assess and respond to potential risks.

Definitions

Money Laundering

The process of concealing the origins of illegally obtained money to make it appear legitimate.

Terrorist Financing

The provision or collection of funds intended to support terrorist activities or organisations.

KYC (Know Your Customer)

Procedures used to verify the identity and legitimacy of customers, suppliers, or business partners.

Beneficial Owner

Ownership for KYC /AML regulations in Connect Install Limited is under the remit of the Director of Finance - **Željka Kranjčec Cesarec**

Key Principles

Connect Install Limited's approach to preventing financial crime is based on the following principles:

- Identification and verification of business partners where appropriate
- A risk-based approach to due diligence
- Monitoring of unusual or suspicious transactions
- Accurate record keeping and confidentiality.
- Reporting suspicious financial activity
- Training and awareness for relevant personnel

Customer and Supplier Due Diligence

Before entering significant contracts or accepting large or unusual payments, the Company may take reasonable steps to verify the identity and legitimacy of business partners.

This may include:

- Verifying company registration details and VAT numbers
- Confirming beneficial ownership where appropriate
- Obtaining identification information for individual clients where necessary
- Assessing the legitimacy of the transaction and the expected payment method
- Conducting additional checks for higher-risk customers or non-EU entities
- The Company may decline to proceed with a transaction if identity or legitimacy cannot be verified.

Risk-Based Approach

Connect Install Limited applies a risk-based approach when assessing financial transactions and business relationships.

Risk indicators may include:

- Type of client or counterparty
- Geographic location of the customer or supplier
- Nature and scale of the services requested.
- Payment method used (for example large cash payments or unusual payment routes)
- Transactions considered higher risk may require additional verification or management approval.

Prohibited Practices

The Company prohibits:

- Accepting large cash payments without appropriate verification and approval
- Processing funds from unidentified or unverified sources
- Assisting in the concealment of the origin, ownership, or destination of funds

- Participating in transactions that may breach sanctions, financial crime legislation, or regulatory restrictions.
- Employees must not knowingly participate in any activity that could facilitate money laundering or terrorist financing.

Record Keeping

The Company will maintain appropriate records relating to financial transactions and business relationships.

Where due diligence checks are conducted, documentation may include:

- Identification records
- Company registration information
- Contracts and invoices
- Payment and transaction records

Such documentation will normally be retained for at least five years after the end of a business relationship, in accordance with applicable legal and business requirements.

All information will be stored securely and managed in accordance with GDPR and data protection legislation.

Reporting Suspicious Activity

Any employee who suspects money laundering, terrorist financing or suspicious financial activity must report the matter immediately to the Operations Manager, Human Resources Manager or AML Officer (Director of Finance)

The responsible officer will assess the concern and determine whether further investigation or external reporting is required.

Employees must not inform the customer or any third party if a report has been made, as this may constitute an offence under Irish law.

Training and Awareness

Connect Install Limited will ensure that relevant employees receive appropriate training on identifying and reporting suspicious financial activity.

Training may include:

- recognising common financial crime indicators
- understanding internal reporting procedures
- awareness of legal obligations and data protection requirements
- Refresher training may be provided where legislation or company procedures change.

Data Protection

Personal data collected as part of any AML or due diligence process will be managed securely and confidentially in accordance with:

- General Data Protection Regulation (GDPR)
- Data Protection Act 2018

- Such information will only be used for legitimate compliance, risk management, and operational purposes.

Non-Compliance

- Failure to comply with this policy may result in:
- disciplinary action, up to and including dismissal.
- termination of contracts with suppliers or business partners
- reporting to relevant authorities where required.

Responsibilities

Board / Directors

Provide oversight of financial crime risk and ensure appropriate resources and procedures are in place.

Management

Implement this policy, maintain records, review reports of suspicious activity and coordinate internal responses.

Employees

Follow internal procedures, remain vigilant for suspicious financial activity and report concerns immediately.

Review and Updates

This policy will be reviewed annually or upon:

- Legislative or governance changes.
- Recommendations from auditors, regulators, or legal advisers.
- Any amendments must be approved by the Board and communicated to all directors.
- Communicated to employees and, where appropriate, to contractors, suppliers, and other business partners.

Approval and Ownership

Role	Responsibility
Framework Owner	Risk & Compliance Lead (Human Resources Manager)
Approved By	Board / Executive Leadership
Review Frequency	Annual
Effective Date	Q2 FY27
Version	1.0

Anti-Tax Evasion Policy

Introduction

Connect Install Limited is committed to conducting its business with integrity, transparency and in full compliance with all applicable tax laws and regulations.

Tax evasion is a criminal offence. The Company prohibits any form of tax evasion or the facilitation of tax evasion by employees, contractors, suppliers or any third parties acting on its behalf.

Engaging in, assisting with, or failing to prevent tax evasion could expose both the individual and the Company to criminal penalties, financial sanctions, and significant reputational damage.

Connect Install Limited therefore operates a zero-tolerance approach to tax evasion and the facilitation of tax evasion.

Purpose

The purpose of this policy is to:

- Ensure compliance with applicable tax laws and regulations.
- Prevent employees and business partners from participating in tax evasion or facilitating tax evasion.
- Promote ethical and transparent financial practices across all company operations.
- Provide guidance on identifying and reporting suspected tax evasion.

Scope

This policy applies to:

- All employees, directors, and management of Connect Install Limited
- Contractors, consultants, subcontractors, and agents acting on behalf of the Company.
- Suppliers, partners and any other third parties involved in business transactions with the Company.
- All individuals connected with the Company are expected to comply with this policy.

Definition of Tax Evasion

Tax evasion is the illegal practice of deliberately avoiding or reducing tax liabilities through unlawful means.

This may involve:

- Concealing income or financial transactions
- Providing false information to tax authorities
- Creating artificial arrangements that exist solely to avoid tax obligations.
- Failing to declare taxable income or financial benefits

Tax evasion differs from legitimate tax planning, which involves lawful use of tax rules.

Indicators of Potential Tax Evasion

Employees should remain alert to warning signs that may indicate tax evasion or attempts to facilitate tax evasion. These may include:

- Requests for payments to be made in cash without reasonable justification.
- Overly complex or unusual payment arrangements
- Transactions under jurisdiction/authority with limited financial transparency.
- Unnecessarily complex supply chains or intermediaries
- Requests to make payments through private banking facilities or third parties.
- Incomplete, missing, or inconsistent financial records
- Requests to misrepresent invoices, contracts, or financial documentation.
- Any such indicators should be treated with caution and reported internally.

Policy Statement

Connect Install Limited prohibits any employee or person acting on its behalf from:

- Participating in tax evasion
- Assisting another person or organisation to evade tax
- Ignoring suspicious financial arrangements that may indicate tax evasion.
- Falsifying or concealing financial records.
- All financial transactions must be conducted transparently and accurately recorded in the Company's books and records.

Reporting Concerns

Any employee or person working on behalf of Connect Install Limited who becomes aware of suspected tax evasion must report the matter immediately to:

- their line manager; or
- the Human Resources Manager
- Employees may be asked to provide a written account of the circumstances.
- Reports will be treated confidentially wherever possible, and no employee will suffer retaliation for raising a concern in good faith.
- Employees may also refer to the Company's Whistleblowing / Protected Disclosures Policy for further guidance.

Investigation and Consequences

Where a concern is raised, Connect Install Limited will conduct an appropriate investigation.

If an employee or representative is found to have engaged in or facilitated tax evasion, disciplinary action may be taken, which could include:

- disciplinary sanctions up to and including dismissal.
- termination of contractual arrangements
- reporting the matter to relevant authorities where required
- Training

Connect Install Limited will provide appropriate training and guidance to employees regarding financial crime prevention, including tax evasion risks.

Review and Updates

This policy will be reviewed annually or upon:

- Legislative or governance changes.
- Recommendations from auditors, regulators, or legal advisers.
- Any amendments must be approved by the Board and communicated to all directors.
- Communicated to employees and, where appropriate, to contractors, suppliers, and other business partners.

Approval and Ownership

Role	Responsibility
Framework Owner	Risk & Compliance Lead (Human Resources Manager)
Approved By	Board / Executive Leadership
Review Frequency	Annual
Effective Date	Q2 FY27
Version	1.0

Section 3 - People & Human Rights

Equality, Diversity, and Inclusion Policy

Purpose

Connect Install Limited is committed to creating and maintaining a workplace where equality, diversity, inclusion, and respect are fundamental values.

We aim to provide a working environment that is free from discrimination, harassment, victimisation, and bullying, where all individuals are treated with dignity and respect.

This policy ensures that all employment decisions are made fairly and that equal opportunities are available to all employees and applicants.

Our Commitment

Connect Install Limited is an equal opportunities employer. We are committed to:

- Promoting equality of opportunity for all employees and job applicants
- Preventing unlawful discrimination, harassment, and victimisation
- Valuing diversity and encouraging an inclusive workplace culture
- Ensuring employment decisions are based on merit, qualifications, and ability.
- Removing barriers that may disadvantage individuals or groups.
- We value people as individuals with diverse opinions, cultures, lifestyles, and experiences. We believe that an inclusive and diverse workforce strengthens our organisation and contributes to better decision-making, innovation, and service delivery.
- All employees, contractors, and workers are expected to treat others with fairness, dignity, and respect.

Scope

This policy applies to:

- All employees (permanent, temporary, full-time, and part-time)
- Agency workers, contractors, and consultants
- Apprentices, trainees, and work experience participants
- Job applicants and candidates

The policy applies to all areas of employment including:

- Recruitment and selection
- Training and development
- Promotion and career progression
- Pay, benefits and working conditions.
- Performance management
- Discipline and dismissal.

- Day-to-day working relationships

Legal Framework

- This policy is informed by and complies with relevant Irish legislation including:
- Employment Equality Acts 1998–2015
- Equal Status Acts 2000–2018
- Safety, Health, and Welfare at Work Act 2005

Protected Grounds

- Under Irish equality legislation, discrimination is prohibited on the following nine grounds:
- Gender (including pregnancy and maternity)
- Civil status
- Family status
- Sexual orientation
- Religion or belief
- Age
- Disability
- Race (including nationality, ethnic or national origin)
- Membership of the Traveller community

Connect Install Limited will ensure that no employee, job applicant, or service user is treated less favourably on any of these grounds.

Forms of Discrimination

Discrimination may occur in several ways, including:

- Direct discrimination
Treating a person less favourably because of a protected characteristic.
- Indirect discrimination
Applying a policy or practice that disadvantages a particular group without objective justification.
- Harassment
Unwanted conduct that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment.
- Sexual harassment
Unwanted verbal, non-verbal or physical conduct of a sexual nature.
- Victimisation
Treating someone unfairly because they have raised or supported a complaint under equality legislation.

Such behaviour will not be tolerated and may result in disciplinary action.

Equality in Employment Practices

Recruitment and Selection

- Recruitment will be conducted in a fair, transparent, and objective manner.

- Selection decisions will be based solely on skills, qualifications, experience, and suitability for the role.
- Reasonable accommodations will be provided during recruitment where required.

Training and Development

- Employees will have equal access to training, development, and career progression opportunities.
- Decisions relating to development and promotion will be based on objective criteria and business needs.
- Pay and Conditions
- Connect Install Limited is committed to equal pay for work of equal value.
- Terms and conditions of employment will be applied consistently and fairly across the workforce.

Discipline and Dismissal

Disciplinary and dismissal procedures will be applied fairly and consistently and will not discriminate against any employee.

Reasonable Accommodation

The Company will provide reasonable accommodation to enable employees and job applicants with disabilities to participate fully in the workplace, unless doing so would impose a disproportionate burden on the organisation.

Adjustments may include:

- Modifying workstations or equipment
- Adjusting working hours or duties
- Providing assistive technologies or supports
- Improving accessibility to buildings or information

Roles and Responsibilities

Management Responsibilities

- Managers and supervisors are responsible for:
- Promoting equality and diversity within the workplace
- Implementing this policy effectively
- Addressing inappropriate behaviour promptly
- Ensuring fair decision-making processes

Employee Responsibilities

- All employees must:
- Treat colleagues, clients and others with dignity and respect
- Always comply with this policy.
- Report discrimination, harassment, or victimisation where it occurs.
- Every employee has a role to play in maintaining a respectful and inclusive working environment.

Complaints and Grievances

Any employee who believes they have been subjected to discrimination, harassment or victimisation should raise the matter through the Company's Grievance Procedure.

All complaints will be:

- Taken seriously.
- Treated confidentially where possible.
- Investigated promptly and fairly
- No employee will be penalised for raising a concern in good faith.

Breach of Policy

Breaches of this policy may be treated as a disciplinary matter and may result in disciplinary action, up to and including dismissal.

Review and Updates

This policy will be reviewed annually or upon:

- Legislative or governance changes.
- Recommendations from auditors, regulators, or legal advisers.
- Any amendments must be approved by the Board and communicated to all directors.
- Communicated to employees and, where appropriate, to contractors, suppliers, and other business partners.

Approval and Ownership

Role	Responsibility
Framework Owner	Risk & Compliance Lead (Human Resources Manager)
Approved By	Board / Executive Leadership
Review Frequency	Annual
Effective Date	Q2 FY27
Version	1.0

Human Rights Policy

Introduction

Connect Install Limited is committed to respecting and promoting human rights in all aspects of its operations. We recognise that businesses have a responsibility to uphold fundamental human rights and ensure that our activities do not contribute to human rights abuses.

This policy outlines our commitment to operating in accordance with internationally recognised human rights standards and relevant national legislation.

Our approach is guided by the principles contained in the United Nations Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, and relevant Irish and European legislation.

Purpose

The purpose of this policy is to:

- Promote respect for human rights across all company operations.
- Prevent human rights abuses within our organisation and supply chain.
- Ensure ethical and fair treatment of employees, contractors, and business partners.
- Provide a framework for identifying and addressing potential human rights risks.

Scope

This policy applies to:

- All employees, directors, and management of Connect Install Limited
- Contractors, subcontractors, and consultants working on behalf of the Company.
- Suppliers and business partners within the Company's supply chain
- All locations and activities where the Company operate.
- All individuals and organisations associated with Connect Install Limited are expected to respect the principles outlined in this policy.

Our Human Rights Commitments

Respect for Human Rights

Connect Install Limited will conduct its business in a manner that respects the dignity, rights, and freedoms of all individuals. We aim to ensure that our operations do not cause or contribute to human rights violations.

Fair Working Conditions

We are committed to providing fair working conditions for all employees, including:

- Safe and healthy working environments
- Fair wages and working hours in accordance with applicable laws.
- Protection from harassment, discrimination, and abuse
- Equal opportunities for employment and advancement
- Prohibition of Forced Labour

- Connect Install Limited prohibits the use of forced labour, bonded labour, involuntary prison labour, or any form of human trafficking within its operations or supply chain.
- Further details are outlined in our Modern Slavery Statement.
- Prohibition of Child Labour
- The Company does not employ child labour and complies with all relevant legislation regarding the employment of young workers.
- Additional guidance is provided in our Child Labour Policy.

Equality and non-discrimination

We are committed to providing equal opportunities and promoting diversity and inclusion within our workforce.

We do not tolerate discrimination based on gender, race, age, disability, religion, sexual orientation, or any other protected characteristic under Irish equality legislation.

Further details are set out in our Equality, Diversity, and Inclusion Policy.

Freedom of Association

Connect Install Limited respects the rights of employees to freedom of association and to participate in lawful workplace representation in accordance with applicable laws.

Responsible Supply Chain

We expect our suppliers, contractors, and business partners to operate in accordance with ethical labour practices and respect human rights.

The Company aims to work with organisations that:

- Comply with applicable labour and employment laws.
- Prohibit forced labour and child labour.
- Provide safe working conditions.
- Treat workers with dignity and respect
- Where concerns arise regarding human rights practices within our supply chain, the Company will take appropriate steps to investigate and address such issues.

Reporting Concerns

Employees and stakeholders are encouraged to report any concerns relating to human rights violations or unethical behaviour.

Concerns may be reported through:

- Line management
- The Human Resources Manager or Operations Manager
- The Company's Whistleblowing / Protected Disclosures Policy
- All reports will be treated seriously and investigated appropriately. No individual will suffer retaliation for raising concerns in good faith.

Training and Awareness

Connect Install Limited will promote awareness of human rights responsibilities through internal communication, training, and operational procedures.

Managers are responsible for ensuring that employees understand and comply with this policy.

Review and Updates

This policy will be reviewed annually or upon:

- Legislative or governance changes.
- Recommendations from auditors, regulators, or legal advisers.
- Any amendments must be approved by the Board and communicated to all directors.
- Communicated to employees and, where appropriate, to contractors, suppliers, and other business partners.

Approval and Ownership

Role	Responsibility
Framework Owner	Risk & Compliance Lead (Human Resources Manager)
Approved By	Board / Executive Leadership
Review Frequency	Annual
Effective Date	Q2 FY27
Version	1.0

Anti-Slavery Policy - Modern Slavery Statement

Introduction

Connect Install Limited is committed to conducting business with integrity, transparency, and respect for human rights. We have a zero-tolerance approach to modern slavery, human trafficking, forced labour and exploitation in all forms.

This statement outlines the steps taken by Connect Install Limited to prevent modern slavery and human trafficking within our operations and supply chains. It demonstrates our commitment to ethical business practices and responsible sourcing.

This statement has been prepared in accordance with the Criminal Law (Human Trafficking) Act 2008, the Criminal Law (Human Trafficking) (Amendment) Act 2013, and, where applicable due to our UK client base, the UK Modern Slavery Act 2015.

The information contained in this statement relates to the fiscal year FY27.

Organisation Structure and Operations

Connect Install Limited operates across Ireland, the United Kingdom, and the European Union from its headquarters at:

Unit 2, Goldenbridge Industrial Estate
Inchicore, Dublin 8, D08 YY38

The company specialises in installation and fit-out services across a range of sectors including:

- Signage and Branding
- Balustrade and Cladding
- Pergola and Outdoor Living
- Interior Fit-Out
- In-house Printing and Production

The organisation is led by three Directors and supported by a growing team of skilled installers, project managers, and operational staff. Since 2022, Connect Install has grown significantly from a small team of ten employees operating three vans to one of the largest installation crews in Ireland.

Our teams operate nationwide across private and commercial premises, including construction sites, working both as primary contractors and subcontractors.

Labour supporting our operations is primarily based in Ireland, with occasional projects conducted in the United Kingdom and other EU countries.

Definition of Modern Slavery

Connect Install Limited recognises that modern slavery can take many forms. For this policy, modern slavery includes:

- Human trafficking
- Forced or compulsory labour
- Servitude or bonded labour

- Exploitation through physical or psychological coercion
- Being treated as property or bought and sold as a commodity.
- Restrictions on freedom of movement or personal autonomy
- We are committed to preventing these practices in both our business operations and supply chains.

Commitment to Ethical Business Practices

Connect Install Limited acknowledges its responsibility to identify and address the risks of modern slavery within its operations and supply chains.

The organisation will not knowingly engage with any individual, supplier or organisation that participates in slavery, servitude, forced labour or human trafficking.

We ensure that all labour used in the delivery of our services is obtained lawfully and ethically, and we strictly adhere to the requirements of Irish employment legislation. In many cases, our employment standards exceed minimum legal requirements.

The organisation remains committed to continuously reviewing and improving its internal practices and supplier relationships to ensure compliance with modern slavery legislation and ethical standards.

Supply Chains

To support its operations, Connect Install Limited works with suppliers and subcontractors primarily within the construction and installation sectors across Ireland and the European Union.

We aim to collaborate with suppliers who share our commitment to ethical labour practices and responsible business conduct.

Risk Assessment and Potential Exposure

Based on the nature of our industry, our operational structure, and the geographic location of our suppliers, Connect Install Limited considers its exposure to modern slavery risks to be low.

However, we recognise that risks can exist within any supply chain. As a result, we remain vigilant in monitoring supplier relationships and identifying potential areas of risk.

The organisation is committed to identifying, assessing, and addressing any risks of modern slavery should they arise.

Due Diligence Processes

Connect Install Limited conducts appropriate due diligence to help ensure modern slavery does not occur within our business or supply chains.

Our processes include:

- Reviewing suppliers and subcontractors prior to engagement
- Monitoring supplier relationships and contractual obligations
- Ensuring employees have the legal right to work in Ireland.
- Conducting internal checks to ensure employees receive at least the National Minimum Wage

- Encouraging transparency and responsible sourcing practices
- To our knowledge, the organisation has not conducted business with any entity found to be involved in modern slavery.

Key Performance Indicators

To measure the effectiveness of our efforts to prevent modern slavery, the organisation monitors the following key indicators:

- Regular supplier due diligence and risk assessments
- Monitoring supplier compliance with ethical labour standards
- Periodic internal reviews and, where appropriate, supplier audits
- Completion of modern slavery awareness training by relevant staff
- Availability and effectiveness of whistleblowing and reporting mechanisms
- Investigation and resolution of any concerns raised regarding labour practices.
- Annual review of policies, procedures, and supply chain risks
- These measures allow the organisation to continuously monitor and strengthen its approach to preventing modern slavery.

Policies and Governance

Connect Install Limited maintains additional policies within its Ethical Code of Practice Pack and Corporate Governance Pack, which reinforce the organisation's commitment to ethical labour practices, responsible sourcing, and compliance with relevant legislation.

These policies support the organisation's approach to preventing modern slavery and promoting responsible business conduct.

Training and Awareness

The organisation provides appropriate training and awareness to relevant employees, particularly those involved in procurement, supply chain management, and human resources.

This training ensures employees understand the risks of modern slavery and human trafficking and know how to identify and report potential concerns.

Reporting Concerns

Connect Install Limited encourages employees, contractors, and business partners to report any concerns relating to modern slavery or unethical labour practices.

Concerns can be raised confidentially through the organisation's whistleblowing procedures, ensuring that all reports are investigated appropriately and without fear of retaliation.

Slavery Compliance Officer

The Human Resources Manager acts as the Slavery Compliance Officer for the organisation. And is responsible for:

- Monitoring the organisation's compliance with this policy
- Investigating concerns relating to modern slavery
- Reporting findings to senior management where necessary

- Ensuring the organisation continues to meet its legal and ethical obligations.

Review and Updates

This statement is made in accordance with the Criminal Law (Human Trafficking) Act 2008, the Criminal Law (Human Trafficking) (Amendment) Act 2013, and, where applicable due to our UK client base, the UK Modern Slavery Act 2015.

- Legislative or governance changes.
- Recommendations from auditors, regulators, or legal advisers.
- Any amendments must be approved by the Board and communicated to all directors.
- Communicated to employees and, where appropriate, to contractors, suppliers, and other business partners.

Approval and Ownership

Role	Responsibility
Framework Owner	Risk & Compliance Lead (Human Resources Manager)
Approved By	Board / Executive Leadership
Review Frequency	Annual
Effective Date	Q2 FY27
Version	1.0

Child Labour Policy

Connect Install Limited is committed to ensuring that child labour is not used within its operations or supply chains. The Company fully complies with all relevant legislation relating to the employment of young workers, including the Protection of Young Persons (Employment) Act 1996.

Due to the nature of the construction and installation industry and the associated health and safety requirements, Connect Install Limited generally recruits individuals over the age of eighteen.

However, the Company may facilitate work experience placements or training opportunities for educational purposes, where appropriate. These placements are limited in scope, always supervised, and designed to provide learning and development opportunities without exposing young persons to hazardous work.

The Company will ensure that:

- Appropriate checks are conducted to verify an individual's age and legal right to work prior to employment.
- All health and safety requirements relating to young workers are fully adhered to.
- Where required, an employment permit is obtained from the relevant educational authority prior to employing a child.
- Records confirming an employee's age and eligibility to work are maintained by the Company.
- Periodic checks may be conducted to ensure continued compliance with legislation.
- The Company will not knowingly employ individuals below the legal minimum working age and will ensure that any employment of young workers is conducted in accordance with statutory restrictions.
- The employment of young workers is subject to strict limits regarding working hours, rest breaks and working conditions.
- Connect Install Limited will ensure that all young workers are protected from work that could be harmful to their health, safety, development, or education, and that appropriate supervision and safeguards are always in place.

Review and Updates

This policy will be reviewed annually or upon:

- Legislative or governance changes.
- Recommendations from auditors, regulators, or legal advisers.
- Any amendments must be approved by the Board and communicated to all directors.
- Communicated to employees and, where appropriate, to contractors, suppliers, and other business partners.

Approval and Ownership

Role	Responsibility
Framework Owner	Risk & Compliance Lead (Human Resources Manager)
Approved By	Board / Executive Leadership
Review Frequency	Annual
Effective Date	Q2 FY27
Version	1.0

Section 4 - Sustainability & Corporate Responsibility

Sustainability Commitment Statement

Connect Install Limited is committed to conducting its business in a responsible, ethical, and sustainable manner. We recognise that our activities have an impact on the environment, society, and the communities in which we operate, and we aim to manage these impacts responsibly while contributing positively to sustainable development.

Our approach to sustainability is guided by the principles of Environmental, Social and Governance (ESG) responsibility. We strive to integrate sustainable practices into our business operations, project delivery, and supply chain relationships.

Environmental Responsibility

Connect Install Limited is committed to reducing the environmental impact of its operations. We work to minimise waste, reduce energy consumption and promote responsible use of natural resources. Through digital systems, efficient operational practices, and responsible procurement, we aim to lower our environmental footprint and support Ireland's transition to a low-carbon and environmentally sustainable economy.

Social Responsibility

We value our employees, clients, and the communities in which we operate. Connect Install Limited is committed to maintaining a safe, inclusive, and respectful working environment. We support employee development through training and career opportunities and promote equality, diversity, and fair working practices across the organisation. We also seek to contribute positively to the communities we work in by supporting local employment, apprenticeships, and community initiatives where possible.

Governance and Ethical Business

Integrity and transparency are fundamental to the way we conduct business. Connect Install Limited operates in accordance with strict ethical standards and maintains policies covering anti-bribery, financial crime prevention, modern slavery, equality, and corporate social responsibility.

We expect the same exacting standards from our suppliers, contractors, and business partners.

Continuous Improvement

Sustainability is an ongoing process. Connect Install Limited is committed to continually improving its environmental and social performance through regular monitoring, employee engagement, and the adoption of best practices.

By embedding sustainability into our business operations, we aim to create long-term value for our clients, employees, stakeholders, and the wider community.

Review and Updates

This policy will be reviewed annually or upon:

- Legislative or governance changes.
- Recommendations from auditors, regulators, or legal advisers.
- Any amendments must be approved by the Board and communicated to all directors.
- Communicated to employees and, where appropriate, to contractors, suppliers, and other business partners.

Approval and Ownership

Role	Responsibility
Framework Owner	Risk & Compliance Lead (Human Resources Manager)
Approved By	Board / Executive Leadership
Review Frequency	Annual
Effective Date	Q2 FY27
Version	1.0

Sustainability & Environmental Policy

Introduction

Connect Install Limited recognises the importance of protecting the environment and operating in a responsible and sustainable manner. The Company is committed to minimising the environmental impact of its operations while promoting environmentally responsible practices across all areas of the business.

In line with the Climate Action and Low Carbon Development Act 2015 (as amended in 2021), which supports Ireland's transition to a low-carbon, climate-resilient and environmentally sustainable economy by 2050, Connect Install Limited aims to integrate sustainable practices into its daily operations, projects, and supply chain activities.

Purpose

The purpose of this policy is to ensure that Connect Install Limited:

- Complies with all applicable environmental legislation and regulatory requirements.
- Minimises the environmental impact of its business operations.
- Promotes efficient use of resources including energy, water, and materials.
- Reduces waste and encourages recycling.
- Encourages environmentally responsible practices among employees, contractors, and suppliers.
- Supports sustainable procurement and operational practices.

Scope

This policy applies to all individuals and organisations associated with Connect Install Limited, including:

- Directors and management
- Employees
- Contractors and subcontractors
- Suppliers and business partners
- Any third parties working on behalf of the Company.
- All stakeholders are expected to support and comply with the principles outlined in this policy.

Environmental Commitment

Connect Install Limited is committed to operating in an environmentally responsible manner and continuously improving its environmental performance.

The Company will:

- Comply with all relevant environmental legislation, regulations, and codes of practice.
- Identify and assess environmental impacts associated with its activities.
- Implement measures to reduce pollution and resource consumption.
- Promote environmental awareness among employees and stakeholders.
- Regularly review environmental performance and sustainability objectives

Waste Management

The Company aims to minimise waste generation and promote responsible waste management practices.

Connect Install Limited will:

- Reduce waste generated through operational activities wherever possible.
- Encourage reuse and recycling of materials where feasible.
- Segregate waste where possible and ensure disposal through licensed waste contractors.
- Promote responsible disposal of construction, packaging, and office waste.
- Continue operating a paperless office environment using digital systems such as Connecteam and SharePoint for documentation and record management.

Energy Efficiency

Connect Install Limited is committed to reducing energy consumption across its operations.

The Company will:

- Encourage employees to switch off computers, lights, printers, and other electrical equipment when not in use.
- Use energy-efficient lighting and equipment wherever possible.
- Ensure heating, lighting and ventilation systems are used efficiently.
- Review opportunities to improve energy efficiency within company facilities.
- Promote energy awareness and responsible behaviour among employees.
- Green Office Practices

To reduce the environmental impact of office activities, employees are encouraged to:

- Minimise printing and use digital documentation wherever possible.
- Use double-sided printing when printing is necessary.
- Switch off electrical equipment when not in use.
- Make use of natural light where practical.
- Use water responsibly and avoid unnecessary consumption.
- Reuse materials such as scrap paper where possible.
- Recycle office waste including paper, plastics, and other recyclable materials.
- Sustainable Travel and Transportation
- Where practical, Connect Install Limited will aim to reduce emissions associated with business travel.

The Company will:

- Encourage virtual meetings and digital communication where possible.
- Promote efficient route planning and responsible vehicle use.
- Encourage the use of public transport or low-emission vehicles where feasible.
- Review fleet management practices to improve fuel efficiency and reduce emissions.

Sustainable Procurement

Connect Install Limited aims to collaborate with suppliers and subcontractors who demonstrate responsible environmental practices.

Where feasible, the Company will:

- Consider environmental impact when selecting suppliers and materials.
- Encourage suppliers to adopt sustainable practices.
- Prioritise locally sourced goods and services where practical.
- Promote responsible sourcing and reduced packaging where possible.

Environmental Management System

Connect Install Limited is working towards adopting the ISO 14001 Environmental Management Standard by 2028.

ISO 14001 provides a structured framework for organisations to:

- Identify environmental risks and impacts.
- Improve environmental performance.
- Ensure compliance with legal requirements.
- Monitor and review environmental objectives.
- The Company is committed to implementing systems and procedures that support continuous improvement in environmental management.

Awareness and Training

- Employees will be made aware of this policy and encouraged to contribute to the Company's sustainability objectives.
- Environmental awareness will be promoted through:
 - staff training and communication.
 - internal procedures and operational guidance
 - encouragement of environmentally responsible workplace behaviour

Review and Updates

This policy will be reviewed annually or upon:

- Legislative or governance changes.
- Recommendations from auditors, regulators, or legal advisers.
- Any amendments must be approved by the Board and communicated to all directors.
- Communicated to employees and, where appropriate, to contractors, suppliers, and other business partners.

Approval and Ownership

Role	Responsibility
Framework Owner	Risk & Compliance Lead (Human Resources Manager)
Approved By	Board / Executive Leadership
Review Frequency	Annual
Effective Date	Q2 FY27
Version	1.0

Corporate Social Responsibility (CSR) Policy

Introduction

Corporate Social Responsibility (CSR) reflects Connect Install Limited's commitment to conducting business in a responsible and ethical manner.

We recognise that our business operations may have social, economic, and environmental impacts beyond the workplace. Through responsible practices, we aim to contribute positively to the communities in which we operate while maintaining exacting standards of integrity, sustainability, and ethical conduct.

Objective

The objective of this policy is to ensure that Connect Install Limited operates in a way that is both commercially successful and socially responsible.

We aim to maintain strong relationships with our stakeholders, including:

- Employees
- Clients and customers
- Suppliers and contractors
- Regulators
- Local communities

By integrating responsible business practices into our daily operations, we seek to contribute to a sustainable and inclusive society.

Our CSR Commitments

Environmental Responsibility

We recognise our responsibility to minimise the environmental impact of our operations. We are committed to:

- Promoting efficient use of resources including electricity, water, and materials
- Reducing waste generated by our operations
- Recycling materials wherever feasible
- Encouraging responsible printing practices and reducing unnecessary paper use
- Using technology to reduce the need for travel
- Encouraging the use of public transport or low-emission vehicles where possible
- Promoting energy awareness within the organisation through internal initiatives and responsible workplace practices

Community and Charitable Engagement

Connect Install Limited values the communities in which we operate and aim to support local initiatives wherever possible.

We support community engagement through:

- Sponsorship and donations to local and national charities
- Supporting community projects and initiatives

- Encouraging employees to suggest charitable activities or causes
- Considering opportunities to support initiatives that contribute to community development.

Education and Skills Development

We recognise the importance of education and professional development in strengthening our industry and community.

We support education and training through:

- Providing work experience placements in partnership with local educational institutions
- Supporting employee training and professional development
- Encouraging continuous learning and skills development within our workforce

Our Employees

Our employees are fundamental to the success of our organisation.

We are committed to:

- Maintaining open and honest communication with employees
- Encouraging staff involvement and feedback on company operations and services
- Providing a safe and respectful working environment
- Supporting employee wellbeing and professional growth

Equality and Inclusion

Connect Install Limited is committed to providing equal opportunities for all employees and job applicants.

We do not tolerate discrimination on any grounds protected under Irish equality legislation. Recruitment, promotion, training, and workplace decisions are based on merit, skills, and experience.

Further information can be found in our Equality, Diversity, and Inclusion Policy.

Responsible Business Partnerships

We aim to collaborate with suppliers, contractors and business partners who share our commitment to ethical and responsible business practices.

Where possible, we will:

- Support local suppliers and businesses.
- Encourage responsible environmental and ethical practices within our supply chain.
- Expect suppliers and partners to uphold similar standards of social responsibility.

Ongoing Commitment

Connect Install Limited is committed to continually improving its CSR performance.

We will consider the potential social, environmental, and ethical impacts of business decisions and strive to ensure our operations contribute positively to society and the environment.

This policy supports our broader commitments to sustainability, ethical governance, and responsible business conduct.

Review and Updates

This policy will be reviewed annually or upon:

- Legislative or governance changes.
- Recommendations from auditors, regulators, or legal advisers.
- Any amendments must be approved by the Board and communicated to all directors.
- Communicated to employees and, where appropriate, to contractors, suppliers, and other business partners.

Approval and Ownership

Role	Responsibility
Framework Owner	Risk & Compliance Lead (Human Resources Manager)
Approved By	Board / Executive Leadership
Review Frequency	Annual
Effective Date	Q2 FY27
Version	1.0

Employee Volunteering Policy

Purpose

The purpose of this policy is to outline Connect Install's commitment to supporting employees who wish to participate in volunteering activities that contribute positively to society, the environment, or local communities.

The company recognises volunteering as:

- Strengthen community relationships.
- Support social and environmental causes.
- Develop employee skills and teamwork.
- Enhance company culture and reputation.

Scope

This policy applies to:

- All permanent and fixed-term employees of Connect Install.
- Volunteering activities undertaken:
 - Individually or as part of a company-organised initiative; or
 - Independently, with prior company approval where company time is requested.
- Contractors and agency staff may participate in volunteer programmes by agreement but are not eligible for paid volunteering leave.

Policy Statement

Connect Install encourages employee volunteering as part of its Corporate Social Responsibility (CSR) and Sustainability Strategy.

The company will:

- Provide opportunities for employees to engage in meaningful volunteering.
- Support team-based volunteering initiatives that strengthen community partnerships.
- Ensure volunteering activities are conducted safely and ethically.

Objectives

The objectives of this policy are to:

- Promote active community engagement and social responsibility.
- Enable employees to contribute their time and skills to worthwhile causes.
- Support local, environmental, and educational initiatives aligned with company values.
- Foster collaboration, leadership, and personal development.
- Strengthen Connect Install's positive reputation in the community.

Types of Volunteering Supported

Category	Examples	Support Provided
Company-Sponsored Volunteering	Team volunteering days, community clean-ups, sustainability events	Paid time off (company-organised days)
Employee-Initiated Volunteering	Charity work, mentoring, fundraising, or skill-sharing	Up to five unpaid days per calendar year (with approval)
Emergency or Humanitarian Volunteering	Crisis response, national relief projects	Additional unpaid leave or flexibility, as approved
Professional / Skills-Based Volunteering	Using trade skills (e.g., electrical, installation, IT) for community benefit	May be supported with company equipment or PPE (approved in advance)

Eligibility

Employees are eligible to participate in paid volunteering where they:

- Have completed at least 6 months of continuous service.
- Have satisfactory performance and attendance records.
- Ensure the volunteering activity:
 - Aligns with company values and CSR priorities.
 - Is conducted with a reputable organisation.
 - Does not present reputational or safety risks to the company.

Volunteering Leave Entitlement

Type of Leave	Entitlement	Conditions
Unpaid Volunteering Leave	By agreement (normally up to 5 days per year)	For extended or overseas volunteering projects
Team Volunteering Events	As scheduled by the company	Considered working time if approved and supervised

Unused volunteering days cannot be carried over into the following year or exchanged for pay.

Application and Approval Procedure

Submit Request: Employees must complete a Volunteering Leave Request Form at least 4 weeks in advance, stating:

- Organisation and purpose of volunteering activity.
- Dates and duration.
- Any company resources required.

Line Manager Review:

- Assess operational feasibility and workload coverage.
- Verify the volunteering activity aligns with policy aims.

HR / Management Approval:

- Confirm eligibility and ensure compliance with company standards.
- Record approved volunteering leave in HR records.

Company-Sponsored Volunteering Initiatives

Connect Install may organise or support group volunteering events such as:

- Local community clean-ups or repairs.
- Educational or training initiatives.
- Environmental sustainability projects.
- Fundraising events for local charities.
- Participation in company-sponsored volunteering during work hours is considered paid time, and employees are expected to conduct themselves professionally, following safety and conduct rules.

Safety and Insurance

All volunteering activities must adhere to Safety, Health, and Welfare at Work Act 2005 standards.

Employees must not undertake any activity that could endanger themselves or others.

When volunteering under company sponsorship, Connect Install's insurance policies will normally apply.

For external volunteering, employees should confirm insurance coverage with the host organisation.

Code of Conduct

- During volunteering activities, employees must:
- Uphold Connect Install's values of professionalism, integrity, and respect.
- Follow the Code of Conduct, Health & Safety Policy, and relevant site rules.
- Avoid conflicts of interest, discrimination, or political activity while representing the company.

Expenses and Equipment

- Reasonable travel or out-of-pocket expenses may be reimbursed for approved volunteering, subject to prior authorisation and receipts.
- Company equipment, tools, or vehicles may only be used with written approval and appropriate supervision.

Monitoring and Reporting

- HR will maintain records of volunteering leave usage and participation.
- The company will report volunteering outcomes as part of its Sustainability / ESG reporting.
- Feedback from employees and partner organisations will be used to improve future initiatives.

Recognition and Communication

- The company may recognise outstanding volunteering contributions through internal communications or awards.
- Employees are encouraged to share volunteering stories and photos (with consent) for inclusion in newsletters or social media, to celebrate team impact.

Related Policies

This policy should be read in conjunction with:

- Health & Safety Policy
- Code of Conduct / Ethics Policy
- Sustainability Policy
- Equality, Diversity & Inclusion Policy
- Leave and Absence Policy

Review and Updates

This policy will be reviewed annually or upon:

- Legislative or governance changes.
- Recommendations from auditors, regulators, or legal advisers.
- Any amendments must be approved by the Board and communicated to all directors.
- Communicated to employees and, where appropriate, to contractors, suppliers, and other business partners.

Approval and Ownership

Role	Responsibility
Framework Owner	Risk & Compliance Lead (Human Resources Manager)
Approved By	Board / Executive Leadership
Review Frequency	Annual
Effective Date	Q2 FY27
Version	1.0

Section 5 - Supply Chain & Procurement

Supplier Code of Conduct

Introduction

Connect Install Limited is committed to conducting business in an ethical, responsible, and sustainable manner. This Supplier Code of Conduct outlines the standards and expectations that we require from all suppliers, subcontractors, service providers, and business partners who work with or on behalf of Connect Install Limited.

Suppliers are expected to operate in accordance with applicable laws and to uphold the principles of ethical business conduct, environmental responsibility, and respect for human rights.

Scope

This Code of Conduct applies to:

- All suppliers and subcontractors providing goods or services to Connect Install Limited
- Consultants, agents, and intermediaries acting on behalf of suppliers.
- Any third party involved in the delivery of products or services within our supply chain.
- Suppliers are responsible for ensuring that their employees, subcontractors, and supply chain partners comply with the principles outlined in this Code.

Legal Compliance

Suppliers must comply with all applicable laws, regulations, and industry standards in the countries in which they operate.

This includes compliance with laws relating to:

- Labour and employment
- Health and safety
- Environmental protection
- Anti-bribery and anti-corruption
- Financial crime and tax regulations
- Data protection and confidentiality
- Human Rights and Labour Standards
- Fair Treatment and Respect
- Suppliers must treat all workers with dignity and respect and provide a working environment free from harassment, discrimination, intimidation or abuse.

Forced Labour

Suppliers must not use forced labour, bonded labour, involuntary prison labour, or any form of human trafficking.

Child Labour

Suppliers must not employ child labour and must comply with all applicable laws regarding the minimum working age and employment of young workers.

Working Conditions

Suppliers must provide fair working conditions, including:

- Compliance with working hour regulations
- Payment of wages in accordance with applicable laws
- Safe and healthy working environments
- Adequate training and supervision for workers
- Suppliers must comply with applicable occupational health and safety legislation and maintain appropriate safety procedures.
- Ethical Business Conduct

Anti-Bribery and Corruption

Suppliers must comply with all applicable anti-bribery and anti-corruption laws and must not offer, give, or accept bribes, kickbacks, or improper payments in connection with business dealings with Connect Install Limited.

Conflicts of Interest

Suppliers must disclose any actual or potential conflicts of interest that could affect their business relationship with Connect Install Limited.

Financial Integrity

Suppliers must maintain accurate financial records and must not engage in fraudulent, deceptive, or misleading business practices.

Environmental Responsibility

Suppliers are expected to operate in an environmentally responsible manner and comply with relevant environmental legislation.

Where possible, suppliers should:

- Minimise waste and pollution.
- Use energy and natural resources efficiently.
- Promote recycling and responsible waste disposal.
- Reduce environmental impact within their operations and supply chain.
- Suppliers are encouraged to adopt environmental management practices aligned with recognised standards such as ISO 14001 or similar where appropriate.

Health and Safety

Suppliers must ensure that their employees work in a safe and healthy environment and comply with all relevant health and safety regulations.

Suppliers working on Connect Install Limited sites must follow all applicable site safety procedures, risk assessments, and safety instructions.

Data Protection and Confidentiality

Suppliers must protect any confidential or sensitive information obtained through their relationship with Connect Install Limited.

Where personal data is processed, suppliers must comply with the General Data Protection Regulation (GDPR) and applicable data protection laws.

Reporting Concerns

Suppliers are encouraged to report any concerns relating to unethical conduct, legal breaches, or violations of this Code of Conduct.

Concerns may be raised with Connect Install Limited through:

- A designated company contact
- The Operations or Human Resources Manager
- The Company's Whistleblowing / Protected Disclosures procedure
- Suppliers must not retaliate against individuals who report concerns in good faith.

Compliance and Monitoring

Connect Install Limited expects suppliers to comply with this Code of Conduct and may review supplier practices where appropriate.

Failure to comply with this Code may result in:

- corrective action requests
- suspension of business activities
- termination of supplier contracts

Continuous Improvement

Suppliers are encouraged to continually improve their ethical, social, and environmental performance and to promote responsible practices throughout their own supply chains.

Review and Updates

This policy will be reviewed annually or upon:

- Legislative or governance changes.
- Recommendations from auditors, regulators, or legal advisers.
- Any amendments must be approved by the Board and communicated to all directors.
- Communicated to employees and, where appropriate, to contractors, suppliers, and other business partners.

Approval and Ownership

Role	Responsibility
Framework Owner	Risk & Compliance Lead (Human Resources Manager)
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Responsible Procurement Policy

Introduction

Connect Install Limited recognises that the way goods and services are purchased can have significant environmental, social, and economic impacts. The Company is committed to conducting procurement activities in a responsible, transparent, and ethical manner.

This Responsible Procurement Policy outlines the principles that guide our purchasing decisions and supply chain relationships. The policy supports our wider commitments to sustainability, ethical business conduct and compliance with applicable laws and regulations.

Purpose

The purpose of this policy is to ensure that procurement activities conducted by Connect Install Limited:

- Support ethical and responsible business practices.
- Promote environmental sustainability.
- Encourage fair labour standards within the supply chain.
- Deliver value for money while maintaining high ethical standards.
- Reduce environmental and social risks associated with suppliers.

Scope

This policy applies to:

- All employees involved in purchasing or supplier selection
- Contractors and subcontractors acting on behalf of the Company.
- All suppliers and service providers engaged by Connect Install Limited
- All procurement activities must align with the principles outlined in this policy.

Procurement Principles

Connect Install Limited aims to conduct procurement activities based on the following principles:

Legal and Ethical Compliance

All procurement activities must comply with applicable laws, regulations, and internal policies, including those relating to anti-bribery, financial crime, competition law, and ethical conduct.

Transparency and Fairness

Supplier selection and purchasing decisions will be made fairly, objectively, and transparently. Decisions will be based on criteria such as quality, capability, sustainability, reliability, safety, and overall value.

Integrity in Procurement

Employees involved in procurement must avoid conflicts of interest and must not accept gifts, payments or incentives that could influence purchasing decisions.

Supplier Selection

When selecting suppliers, Connect Install Limited will consider:

- Product or service quality
- Health and safety standards
- Environmental practices
- Ethical labour standards
- Supplier reliability and reputation
- Compliance with legal and regulatory requirements
- Where possible, the Company aims to collaborate with suppliers who demonstrate strong environmental, ethical and governance practices.
- Connect Install Limited expects suppliers to respect internationally recognised labour standards and human rights principles.

Suppliers should:

- Prohibit forced labour and human trafficking.
- Prohibit child labour.
- Provide safe working conditions.
- Treat workers with dignity and respect
- Comply with labour laws relating to wages and working hours.
- Suppliers are expected to align with the Company's Supplier Code of Conduct, Human Rights Policy, and Modern Slavery Statement.

Environmental Considerations

The Company aims to reduce environmental impact through responsible procurement practices.

Where practicable, Connect Install Limited will seek to:

- Purchase energy-efficient and environmentally responsible products.
- Reduce packaging and unnecessary materials.
- Prioritise suppliers with sustainable environmental practices.
- Encourage recycling and responsible disposal of materials.
- Consider the lifecycle impact of goods and materials used.

Suppliers are encouraged to implement environmental management practices aligned with recognised standards such as ISO 14001 or similar where appropriate.

Local and Sustainable Sourcing

Where feasible, Connect Install Limited will seek to:

- Support local suppliers and businesses.
- Reduce environmental impacts associated with transportation.
- Promote sustainable and responsibly sourced materials.
- Local sourcing will be balanced with quality, cost, reliability, and project requirements.

Supplier Relationships

The Company aims to build long-term, mutually beneficial relationships with suppliers based on trust, transparency, and shared ethical standards.

Suppliers are expected to:

- Comply with this policy and other relevant company policies.
- Maintain open communication regarding ethical or operational issues.
- Promote responsible practices within their own supply chains.

Monitoring and Compliance

- Connect Install Limited may review supplier performance and practices where appropriate to ensure compliance with ethical and sustainability expectations.
- Where concerns arise, the Company may request corrective actions from suppliers. Failure to comply with this policy may result in suspension or termination of supplier relationships.

Connect Install Limited is committed to continuously improving its procurement practices by:

- Reviewing procurement processes regularly
- Promoting sustainable purchasing decisions
- Encouraging suppliers to improve environmental and social performance
- Aligning procurement practices with evolving industry standards and best practice

Review and Updates

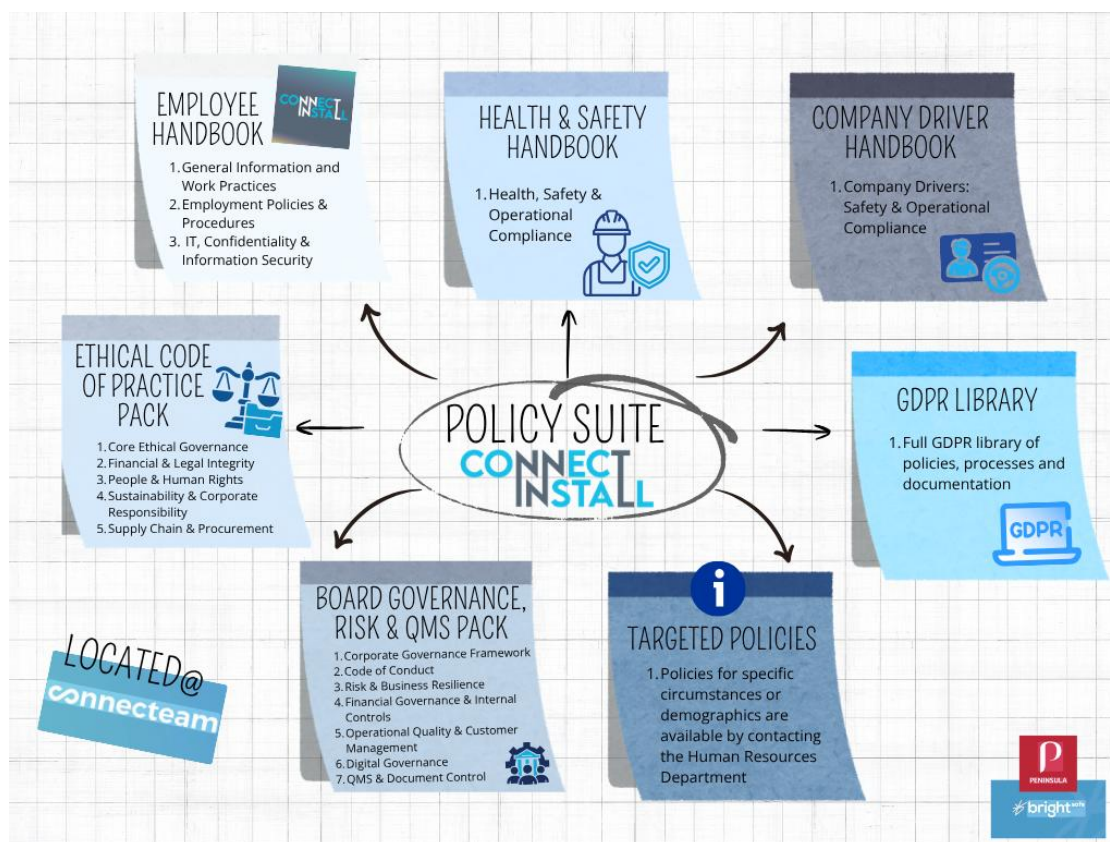
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Framework Owner	Risk & Compliance Lead (Human Resources Manager)
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Related Documentation



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