

Léargas Code of Conduct

September 2017



Contents

Introduction	3
Objectives	3
General principles	4
Integrity.....	4
Good information practice.....	4
Obligation.....	4
Loyalty.....	5
Fairness	5
Commitment to the work and external environments.....	5
Conflicts of Interest.....	6
Responsibilities	6
Review.....	6
CONFIRMATION OF RECEIPT OF THE CODE OF CONDUCT	7

Introduction

This document contains the Code of Conduct for all Board members and employees of Léargas. The Code takes into account the implications of the *Ethics in Public Office Act, 1995 to 2001*. In addition Board members and staff are required to comply with the requirements of the Companies Act 2014. This policy was approved by the Léargas Board on 14 September 2017.

Objectives

The objectives of the Léargas Code of Conduct are to:

- establish an agreed set of ethical principles
- promote and maintain confidence and trust
- prevent the development or acceptance of unethical practices.

General principles

The Léargas Code of Conduct is based on the principles of integrity, good information practice, obligation, loyalty, fairness, commitment to the work and external environments. These principles are described in more detail below.

Integrity

Integrity means:

- provision by Board members or staff of full disclosure of outside work or business interests in actual or potential conflict with the business of Léargas
- purchasing activities or goods/services in accordance with best business practice
- ensuring information is acquired through the proper means
- ensuring that accounts and reports accurately reflect performance and are not misleading
- not giving or receiving gifts, hospitality, preferential treatment or benefits which could affect, or appear to affect the ability to make independent judgement on work-related matters
- not using Léargas resources or time for personal gain, for the benefit of persons/organisations unconnected with the body or its activities or for the benefit of competitors
- competing energetically but ethically and honestly
- ensuring a culture of claiming expenses only as appropriate to business needs and in accordance with good practice in the public sector generally
- not using Léargas resources or time for personal gain, for the benefit of persons or organisations unconnected with Léargas or its activities or for the benefit of competitors
- not acquiring information or business secrets by improper means.

Good information practice

Good information practice means:

- providing general information relating to Léargas activities in a way that ensures accountability to the general public
- respecting the confidentiality of information such as:
 - commercially sensitive information (including, but not limited to, future plans or details of major organisational or other changes)
 - personal information
 - information received in confidence
- instigating appropriate prior consultation procedures with third parties where, exceptionally, sensitive information is to be released in the public interest
- complying with the relevant statutory provisions such as data protection legislation and the *Freedom of Information Act, 2014*.

Obligation

For Léargas Board members and staff, obligation means:

- fulfilling all regulatory and statutory obligations
- acceptance of the duty to conform to the highest standards of business ethics

- introducing controls to prevent fraud
- co-operating with internal auditors in the course of internal audits
- complying with
 - detailed tendering and purchasing procedures
 - prescribed levels of authority for sanctioning any relevant expenditure
 - prescribed procedures for claiming business travel expenses.

For Board members, obligation also means:

- making reasonable endeavour to attend all Board meetings
- establishing and enforcing procedures to avoid conflicts of interest and confidentiality concerns where Board members take up positions in the private sector following employment in Léargas.

Loyalty

Loyalty means:

- being fully committed to Léargas in all its activities

while taking the interests of the owner(s) into account at all times.

Fairness

Fairness means:

- complying with employment equality and equal status legislation
- valuing and treating all clients equally.

Commitment to the work and external environments

Commitment to the work and external environments means:

- promoting the development of a culture of “speaking up” whereby Léargas staff members can raise concerns regarding serious wrongdoings in the workplace without fear of reprisal
- placing the highest priority on promoting and preserving the health and safety of Léargas staff, Board members and clients.
- ensuring that community concerns are taken into consideration.
- minimising any detrimental impact of Léargas operations on the environment.

Conflicts of Interest

Under the *Ethics in Public Office Act, 1995 to 2001*, members of the Board and members of staff in Designated Positions are required to provide to the Secretary of the Board a written statement of any interests they—or to their knowledge, their spouses, civil partner or children—have, which could influence the Board member's decisions in such a way as to benefit the member, their spouse, partner or children.

Additionally, in the event that during an official function or meeting such an issue in which a Board member has a material interest should arise, the Board member is required to furnish a statement of interest. The Board member should absent themselves when the Board is deliberating on the matter of interest and a note of this made in the minutes. The Board will determine whether it is appropriate to keep a separate record of the discussions on such a matter to which the member absenting themselves would not have access on a case by case basis.

Documentation relating to a matter of interest declared by a member should be returned by the member in question and further documentation on the issue should not be made available to him/her.

If the member has some doubt about whether such a conflict exists s/he should consult with the Chairperson.

In the event that the Chairperson identifies a matter of interest, s/he should absent themselves from the meeting and s/he will appoint the deputy chairperson to chair the meeting.

Disclosures of interest outlined above will be kept by the Secretary of the Board in a special confidential register.

Responsibilities

It is the responsibility of the Léargas Board to circulate to all Léargas Board members and staff:

- this Code of Conduct
- a policy document on disclosure of interests
- an explanatory booklet providing practical guidance on any ethical issues which the Board considers pertinent to the proper functioning of Léargas

It is the responsibility of all Léargas Board members and staff members to acknowledge that they have received the documents listed above and seek clarification where necessary.

Review

The Léargas Board will review this Code of Conduct as appropriate.



CONFIRMATION OF RECEIPT OF THE CODE OF CONDUCT

I confirm having received a copy of the Code of Conduct of **Léargas - The Exchange Bureau**, the contents of which have been read and understood by me.

Name: _____

Signature: _____

Date: _____