

National Roads Authority

Code of Business Conduct for Staff Members

The five general principles underlying this Code of Business Conduct, which applies to all staff members of the NRA are:

- Integrity
- Loyalty
- Legal and Regulatory Compliance
- Fairness
- Confidentiality

The central requirement of the Code is that as staff members we must all operate, and be seen to operate, to the highest standards of business ethics. Staff members who are members of professional bodies must carry out their work with proper regard for the technical and professional standards expected of them as members and are required to observe proper standards of professional conduct. Where rules of professional conduct are in conflict with statutory and regulatory requirements or with this code, the more stringent requirement will apply.

Integrity

Staff members should :

- be open, truthful and honest and observe the highest standards of integrity in all their business dealings;
- ensure that there is no conflict of interest between the discharge of their duties as staff members of the NRA and any beneficial interest they may have. A conflict of interest arises where involvement or association with an outside activity could influence or be seen to influence how the NRA carries out its business;
- where an outside interest impacts on any matter that they may have to deal with in the course of their work, declare that interest in writing to the Chief Executive. Specifically if they, or any family member, have a beneficial interest in any company that deals with NRA, this interest must be formally declared to the Chief Executive, and unless directed otherwise, not participate in dealing with the matter concerned, and
- not use any information gained in the course of NRA work for any personal profit.

Staff members must :

- refuse bribes, and report any such approaches in writing to the Chief Executive;
- refuse gifts or hospitality that may affect their ability to make impartial judgement, and report any such approaches in writing to the Chief Executive;
- avoid misrepresenting their position or being ambiguously misleading;
- reject any business practice which might reasonably be deemed to be improper, and
- not abuse their position in the Authority for personal gain.

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Loyalty

Staff members owe to the NRA loyalty and commitment in all its activities. Staff members should support colleagues and the NRA in all matters related to NRA activities. They should not undermine through action or omission the goals and objectives of NRA. All grievances and concerns should be progressed through agreed internal channels prior to any action that might affect public confidence or the good name of the Authority.

Legal and Regulatory Compliance

In order to ensure compliance with all laws / legislation staff members are required to:

- fulfil all regulatory and supervisory obligations applicable to them;
- co-operate with relevant regulatory and supervisory bodies;
- avoid false, inaccurate or mis-leading entries in records;
- ensure that taxation and welfare legislation is upheld;
- ensure their actions comply with relevant contractual obligations, and
- avoid engaging in any illegal or criminal activities.

Fairness

Staff members should :

- ensure that their work is guided by NRA's commitment to fairness in all its dealings and accept the need to value our customers and treat all customers equitably;
- not accept any money or any significant gift from a customer / supplier and not accept any gift from a customer / supplier if it could reasonably be viewed as contributing to the giving of preferential treatment to a customer / supplier;
- ensure that suppliers are paid on time and that the NRA discharges its obligations to suppliers in accordance with the Prompt Payment of Accounts Act, 1997 and European Communities Regulations 2002 under Statutory Instrument No. 388 of 2002;
- note that the NRA places the highest priority on promoting and preserving the health and safety of its employees and the general public. Staff members should take every reasonable precaution to avoid injury to themselves, their colleagues and members of the public;
- treat all their colleagues and customers equally irrespective of gender, marital status, family status, race, colour, creed, sexual orientation, political preferences, age or disablement or membership of the traveller community. The recruitment and promotion of employees will be strictly on merit;
- recognise the effect of NRA activities on the community we serve, and
- ensure that their work for the NRA always takes into account the NRA's commitment to minimising the impact of its operations on the natural environment, consistent with the need to provide infrastructure on a cost effective basis in order to promote Ireland's competitiveness.

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Confidentiality

Staff members should maintain confidentiality in relation to business transactions except when otherwise authorised by the parties involved, or if required by law / legislation. In particular, staff members should not disclose details of confidential NRA matters to third parties, including the media and should honour the requirements of the Data Protection Act.

Staff members should refer to Document number 13 – Protocol for Handling Confidential Information.

Gifts and Entertainment – Practical Guidelines

Gifts may be accepted in appropriate circumstances provided it is clear that in doing so no obligation is imposed on either the Member or the NRA. Normally such gifts will be of modest value. In any year, any gift in excess of €650 in value or group of gifts from a single source with an aggregate value in excess of €650 should be declared in writing to the Chief Executive.

Entertainment of staff members by suppliers or customers is acceptable within normal criteria.

These criteria are defined as follows:

- a meal may be accepted by a staff member at a local venue (but this must not include residential stay);
- a ticket for a sports event / other public entertainment at a local venue may be accepted, and
- under no circumstances may cash or cash / gift vouchers be accepted.

If foreign travel is necessary to investigate products or services the NRA will pay for the trip. Supplier's offers of foreign travel and / or hotel should not be accepted.

Staff members acting in a personal capacity, or on behalf of a club, society or professional body, should not solicit or request a gift, donation, support or sponsorship from suppliers / contractors of goods or services to the NRA or from customers of the NRA. Unsolicited gifts, donations or sponsorship should only be accepted on behalf of a club, society or professional body with prior approval from the Chief Executive and then only if they could reasonably be viewed as not contributing to the giving of preferential treatment to the donor.

These examples are intended as guidelines to help make sensible decisions. Most cases will be obvious. However, if a doubt still exists the matter should be referred to the Chief Executive.