CODE OF ETHICS Team Ballyhass • Exceeding Expectations.



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Welcome to Team Ballyhass

For years we have reacted to opportunities, gaps in the market and reinvented ourselves. However, I feel we have now reached a point where we are committed to a direction of creating, inspiring and being a part of an outdoor generation. A generation of people who know the importance of spending time active outdoors and a generation that puts the outdoors first for themselves their friends and their families.

You are part of a team that has clear goals of what they want to achieve. A team that will always aim to exceed expectations, that will endeavour to improve the experience every time they deliver a session and continue to try and improve that experience every time they pull on a Team Ballyhass Shirt.

"We are committed to building a team that reflects the diversity of the communities we serve and fostering a culture of inclusivity where all employees feel valued and supported." - (From our Diversity Commitment)

You are expected to always put our values and mission first and in return, we will constantly try and develop our team for your future whether that is with Ballyhass or on your own path. Communication is key.

The procedures, policies and guidance provided in this document along with our Safety Management System (SMS) and environmental management system (EMS) will provide a roadmap to help guide you when acting on behalf of Team Ballyhass.

We will operate our business in an ethical manner in respect of all our stakeholders and I think this code of ethics represents that well to all parties.

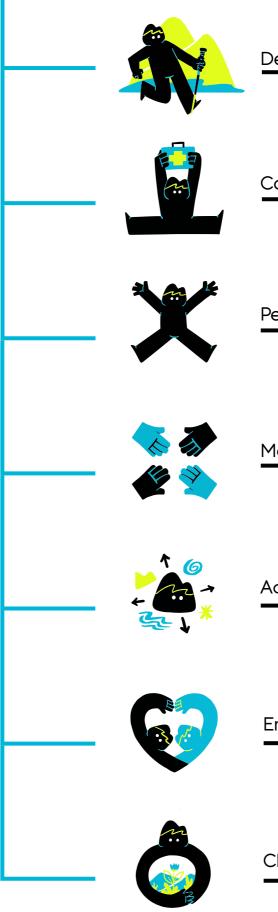
Within this document you will find our fundamental principles and expectations that each of us has towards eachother and the organisation. I hope it will help guide your time spent with Ballyhass.

Eoghan McCarthy General Manager | Director



Our Mission INSPIRING OUFD BBR Generation

Our Values



Our Purpose

To Get Everyone Active Outdoors

Through Accessibility | Affordability | Education



Deliver the best possible experience .

Committed to safety through learning.

Personality, Passion & Fun.

Maximum Participation .

Adapt, Adjust & Accommodate.

Engaging Communities.

Champion the Outdoors.

Our Responsibilities.

- Follow Our Purpose & Values
- Exceed Expectations at every opprotunity
- Use good Judgement and act with integrity
- Follow all policies and laws that apply to your job
- Speak up if you see any violations, misconduct or unethical behaviour



Our Leaders' Responsibilities.

Leadership needs to be authentic, purposeful, open and honest. Its our leaders' responsibility to create a fun and rewarding environment that focuses on the customer experience. Leaders should always practise our values and endeavour to always develop their team.

What does this look like?

- Leaders should foster an environment in which team members feel comfortable coming to you with questions and concerns.
- Always document and escalate concerns raised to you through the correct channels. Don't put the burden back on the team member to solve the problem.
- Never retaliate against a team member that raises a concern.
- Encourage Employee Participation and feedback.
- Promote Diversity & Inclusion.



🗸 Our Teams Health & Well being

Our Customers

Our Performance

We are committed to delivering the best possible experience and exceeding expectations at all every opportunity. It is the responsibility of all team members to be knowledgeable of all our products and services. All team members must bring their personality and passion to the job when dealing with our customers. We will together try and identify areas where we can better educate and encourage our guests to spend more time outdoors. We expect all team members to do the absolute best they can for all visitors, not just when on a session, but at all times when on site.



JUR COMMITMENT TO SAFETY

At Ballyhass Adventure Group, we are committed to ensuring the safety of our employees and customers. To that end, we will take the following actions:

- Provide Team Members with proper training and equipment to ensure that they are prepared to safely lead outdoor activities or work in the field. This may include first aid and CPR training, as well as instruction on the proper use of equipment such as helmets, harnesses, and other protective gear.
- Establish protocols for responding to emergencies or accidents that may occur in the outdoors. This may include providing team members with emergency contact information, following our SMS Safety Management System and constantly monitoring and assessing our performance on a regular basis, including regularly reviewing and updating emergency procedures.

Ensure that all equipment and facilities are regularly inspected and maintained to prevent accidents or injuries. This may include performing regular maintenance and safety checks on equipment, and ensuring that all facilities, bunkhouses, specialty equipment and all customer accessed areas meet relevant safety standards.

Encourage team members to report any safety concerns or incidents, and take appropriate action to address them. This may include conducting investigations into incidents, implementing corrective measures to prevent similar incidents from occurring in the future, and providing additional training or resources to employees as needed. We are committed to created a Culture of Safety throughout all Ballyhass Operations



The health safety and welfare of our customers and visitors are of the utmost importance to the company. This cannot be sacrificed for any reason. We are committed to designing and maintain activities to the highest standards that we have set for ourselves. We will always ensure third-party safety reviews where possible. It is for all of Team Ballyhass to ensure that our customers feel safe and secure at all times.

It is all our responsibility as Team Ballyhass to ensure that;

- We provide clear instructions and guidelines for customers to follow when instructions to ensure that they are accurate and complete.
- 02 Monitoring weather conditions and adjusting activities or routes as necessary hazards, and establishing protocols for modifying activities or routes in response to changing conditions.
- **03** Ensuring all emergency kits and supplies, such as first aid kits, flashlights, or signalling devices, are available to customers who are participating in event of an emergency.
- **04** Following the established protocols for responding to emergencies or emergency procedures.
- **05** Providing customers with information about potential risks or hazards that outdoor activities.



participating in all of our outdoor activities. This may include providing written or verbal instructions on the proper use of equipment or safety precautions that customers should take, and regularly reviewing and updating these

to ensure customer safety. This may include using weather forecasting tools, such as radar or satellite imagery, to stay informed about potential weather

our outdoor activities. This may include regularly checking and replenishing emergency supplies, and ensuring that customers know how to use them in the

accidents that may occur during any of our activities. This includes ensuring you have the correct emergency contact information, training them on how to use emergency signalling devices, and regularly reviewing and updating our

may be associated with outdoor activities, and encouraging customers to take appropriate precautions to minimize those risks. This includes disclosing any relevant warnings or precautions that customers should be aware of, and providing guidance on how customers can stay safe while participating in

Our Customers

At Ballyhass, we believe that our customers are the most important part of our business. We are dedicated to providing the best possible experience for all of our customers and making sure that their needs and concerns are always a top priority.



This commitment to our customers is reflected in our code of ethics, which emphasizes the importance of honesty, respect, and professionalism in all of our interactions with our customers. We believe that by treating our customers with the utmost care and consideration, we can create long-lasting relationships based on trust and mutual respect. We value the trust that our customers place in us and are committed to always acting in their best interests.

()UR ()OMMITMENT TO OUR ()USTOMERS

"At Ballyhass Adventure Group, we are committed to providing our customers with the highest level of quality, service, and value. To that end, we will take the following actions:

- If the products and services that meet or exceed customer expectations. This may include using top-quality materials and techniques in the production of our products, and regularly reviewing and updating our products and services to ensure that they meet customer needs.
- Respond to customer inquiries and concerns in a timely and effective manner. This may include establishing clear channels of communication for customers to use when they have questions or concerns, and providing timely and helpful responses to customer inquiries or complaints.
- Respect customer privacy and protect their personal information. This may include implementing measures to safeguard customer data, such as using encryption and secure servers, and regularly reviewing and updating our data protection policies to ensure that they meet or exceed industry standards.
- Provide clear and accurate information to customers about our products and services, including any potential risks or limitations. This may include disclosing any relevant warnings or precautions that customers should be aware of, and being transparent about any fees or charges that may be associated with our products or services.
- Foster a culture of customer satisfaction within the company. This may include regularly soliciting customer feedback, conducting customer satisfaction surveys, and using customer insights to inform our business decisions and improve our products and services.

See Sallyhass Experience Guarantee



Our Team

Team Ballyhass is our biggest asset. Customers will often remember their instructors long after the activity they chose on any given day. It is our intention to always treat our team with dignity, respect and fairness. We will always try and provide our team with a fun, diverse, exciting and friendly environment.

At Ballyhass Adventure Group, we value our employees and are committed to creating a positive and supportive work environment. To that end, we will take the following actions:

UR COMMITMENT TO OUR

- Provide a safe and healthy work environment, including by complying with all applicable health and safety regulations. This may include implementing measures such as providing personal protective equipment, maintaining clean and wellventilated work spaces, and ensuring that employees have access to clean water and restrooms.
- Treat team members with respect and fairness, and avoid any discrimination or harassment based on factors such as race, gender, religion, or sexual orientation. This may include establishing policies and procedures for addressing and resolving any issues of discrimination or harassment that may arise within the company.
- Provide opportunities for professional development and growth. This may include offering training and development programs, encouraging team members to pursue further education or certification, and providing opportunities for team members to take on new challenges and responsibilities within the company.
- Recognize and reward team members for their contributions. This may include offering competitive salaries and benefits, recognizing and rewarding employees for their hard work and achievements, and providing opportunities for advancement within the company.
- Foster an open and inclusive culture that values diversity and encourages open communication and collaboration. This may include promoting a culture of respect and inclusivity, encouraging team members to share their ideas and feedback, and regularly soliciting employee input and feedback on company policies and practices











Personal Development

Ballyhass is committed to and strives for creating full-season employment opportunities where ever possible. Team Ballyhass is traditionally a young and passionate team, we will always aim to develop and advance our team members in a manner consistent with their abilities and passions. We will expect all team members to prioritize training and development that has a direct impact on customer safety.

Team Ballyhass Safety & Quality Experience

The company is committed to providing a safe work environment for all its team members. Safety Through Learning is a core value. Each season we will endeavour to reassess & review our operations and improve our systems and procedures.

We have worked hard to create a culture of safety through our procedures, policies, external inspections and daily checklists on equipment and PPE. Our HASS system is an industry-leading custom-built safety software to record all training so we can protect the team as a whole.

The Biggest asset to our safety culture is every member of Team Ballyhass, you are alert and aware, ensure best work practices on a daily basis and are on the constant lookout for each other and our customers.

What do we expect of our team members?

Protect yourself and others - Comply with all health and safety regulations, policies and procedures that apply to your position. Be at all required training that is set out at the beginning of the year in your training contract. Report any near misses, or unsafe work conditions straight away so we can take steps to make sure you're ok, and prevent harm to others.

Protect Yourself.

Think safety first every day and every session.

Only take on sessions for which you have been trained for and signed off on the HASS system. If you for any reason feel unsure about any action STOP what you are doing and touch base with your nearest lead instructor, coordinator, supervisor or manager. For all sessions refer to your session plans, risk assessments and SOP's which are all in your training files. Wear your PPE at all times while on session. You are a leader and you are setting an example for Team Ballyhass while you are on site.

Bring your best self to work

Substance abuse can not only prevent you from doing your job safely but also jeopardise the safety of others. That's why you are prohibited from being under the influence of alcohol or illegal drugs while you are at work. At occasions where alcohol is permitted please make sure you used good judgment and moderation.

Personal Information (keep information private)

We have a great community within Team Ballyhass and always have active staff communication channels. During onboarding we will go through each channel and when and where it is appropriate to discuss topics outside of work, social gatherings etc.

At no time is it appropriate to use any of your colleague's information or details for anything outside of work communication without their consent. Please respect your team's details at all times. We will consider it a serious breach of data if used inappropriately and disciplinary action can be taken.

- linked to an individual
- Honour our privacy policies
- information to anyone else.
- Get clearance when in doubt just ask!

Use of phone while at work

You are allowed to have your phone on you while at work. The main reason for this is for emergency situations where it may be quicker to alert a colleague or the office. Other than emergency use your phone is to be kept on silent so you can commit fully to delivering the best possible experience on your session.

Time Keeping

All of our experiences are instructor lead. If you are not there, the experience is tarnished immediately. We have a big team rooting for one another. Communication is key, if you are running late or cant do a certain shift please let your supervisor know ASAP. If you think there is any chance that you can not make it the following day, the earlier communication the better. It allows the roster team to seamlessly change the following day with little interruption.

Don't underestimate the amount of time required to change the roster last minute. Not every team member can do the same activities so one change could mean many.

Please show courtesy to your colleagues and inform them early and often.





- Recognize personal information - any information that can be reasonably

- Know when it's okay to share - we promise we will never provide or share

Diversity.



We will always maintain a working environment where everyone is advantaged by their potential and no one is disadvantaged by their belonging to a particular group. We believe that diversity is responsible for a robust range of experiences, and allows them to be constantly improved season on season.

()UR (OMMITMENT TO DIVERSITY

"At Ballyhass Adventure Group, we believe that the great outdoors is for everyone. We are committed to building a team that reflects the diversity of the communities we serve and fostering a culture of inclusivity where all employees feel valued and supported. We recognize that people from different backgrounds bring unique perspectives and experiences that enrich our work and enhance our ability to connect with a diverse range of customers and stakeholders. We are committed to promoting accessibility and inclusivity in the outdoors. We believe that everyone should have the opportunity to experience the beauty and benefits of nature, regardless of their physical abilities or other personal characteristics as layout in our core values."





Respect for the individual

We will always strive to celebrate and harness our diversity. We believe that this will ultimately better serve to achieve our purpose. We will be fair, honest and constructive and above all be friendly and kind. We are looking to build an environment of trust and collaboration.

We will be open and respectful of other people's both team members' and customers' viewpoints and backgrounds. Our differences shouldn't divide us, they should make us stronger in pursuit of an outdoor generation.

Respect Each Other.

A workplace that is free of harassment, bullying and abusive conduct. You need to be at your best and feel safe in your environment.

Check yourself and your own behaviour..

Treat everyone with respect and dignity at all times. Educate yourself and ask questions if you have any concerns

Recognize harassment when you see it.

Harassment is intimidation, hostile or offensive conduct that interferes with someone's ability to work or creates a hostile work environment.

Don't be idle.

If you see or experience any disrespectful or inappropriate behaviour please don't ignore it. If you are comfortable to approach someone on it please ask them to stop. If you feel uncomfortable please approach any senior member of staff.





OUR COMMITMENT TO OUR TEAMS WELLBEING

At Ballyhass Adventure Group, we believe that supporting the well-being of our Team members is crucial to their success and to the success of the company. To that end, we will take the following actions:

- Promote work-life balance by offering flexible work arrangements, such as telecommuting, part-time schedules, or flexible start and end times. This may include establishing policies and procedures for requesting and approving flexible work arrangements through our whenlwork scheduling software, and regularly reviewing and updating our policies to ensure that they meet the needs of our employees.
- Offer wellness programs and resources to help employees maintain their physical and mental health. This may include providing access to fitness facilities, offering weekly staff nights during the season, and providing resources such as mental health support or stress management training.
- Provide resources to help employees manage stress and maintain mental health. This may include offering access to mental health resources such as counselling or therapy services, providing training on stress management techniques, and establishing policies and procedures for managing and addressing stress-related issues within the company.
- Foster a positive and supportive work culture that promotes open communication and collaboration. This may include establishing channels for employees to share their ideas and feedback, and regularly soliciting employee input and feedback on company policies and practices.



Social Media Use

See

Social media has the potential to affect the Ballyhass reputation, please use it wisely. We believe that capturing our team and customers' experience is a vital part of how the world see us, we are always looking to add to our social media teams for people looking to be the next face of Ballyhass. It is your personal responsibility to familiarise yourself with the current social media company guidelines. When in doubt please ask. We guarantee our marketing team will be delighted to have you involved.

Please protect our customers privacy at all costs. Everyone who is taking part in activities has signed a release form to allow imagery to be used for marketing purposes. But please ask any customers involved in your content to show respect.

If you wish to be a part of our social team, email marketing@ballyhass.ie . It is a great way to engage with our customers and communities and promote the great experiences we are offering.

Health & Wellness Policy

Communities



()uR ()OMMITMENT TO OUR COMMUNITY

At Ballyhass Adventure Group, we are committed to being a socially responsible company that not only serves our customers but also gives back to the communities where we operate. To that end, we will take the following actions:

- Support and participate in community development projects, such as by volunteering time or resources to local organizations or charities. This may include supporting initiatives that promote outdoor education and recreation, as well as initiatives that address issues such as homelessness, hunger, or environmental conservation.
- Engage with local stakeholders, including community members, local businesses, and government officials, to learn about their needs and concerns and to address any issues that may arise. This may include participating in community meetings, consulting with local experts, and working with local authorities to resolve any issues that may affect our operations.
- Promote outdoor education and recreation as a way to improve physical and mental health, and support initiatives that encourage people of all ages and abilities to get active outdoors. This may include partnering with local schools or community centers to provide outdoor programming, or supporting initiatives that promote outdoor access and recreation in underrepresented communities.
- Foster a culture of social responsibility within the company. This may include encouraging team members to get involved in community service projects, supporting employee-led initiatives to give back to the community, and regularly reviewing and updating our Ballyhass outdoor project to ensure it aligns with our values and mission.
- The Ballyhass Outdoor Project includes such practices as our work experience scholarships, Site sponsorships to local organizations, sponsorship requests and sponsored inclusive days out for local groups







Champion the **Outdoors**



We are passionate about providing access to the outdoors and educating our customers about how best to safely engage in outdoor activities. We cannot achieve this without protecting the outdoor environment. We are committed to reducing our environmental impact and using our high daily visitor count to educate our customers on how to impact in our industry.

We are planning on making improvements in our operations season on season, and communicating with our customers throughout our journey.

Minimize Our Daily Impact

Please follow our Environmental Management system (EMS) when disposing of materials. Reduce, reuse and recycle whenever your can. Please take advantage of refillable water bottles and coffee cups provided at onboarding each season. You are constantly in public view, please set the standard.

Educate Our Customers

Ask your trainers how we can apply leave no trace principles during your sessions. Take time while on session to showcase other providers in the area and share the information where possible.

Support Our Green Goals

Monitor our EMS system goals and targets and ensure that you know how you can do your part.

Speak Up.

Speak up if you see anywhere that would be appropriate for review or any potential environmental hazards immediately.



EMS Environmental Management system

Employee Handbook

Environmental Purchasing Policy

OUR COMMITMENT TO THE ENVIRONMENT

"At Ballyhass Adventure Group we recognize that our operations have an impact on the natural environment, and we are committed to taking steps to minimize that impact and protect the planet. To that end, we will take the following actions:

- Encourage team Members to be mindful of their environmental impact, both at work and in their personal lives. This may include providing resources and training to help employees understand the environmental consequences of their actions and make more sustainable choices.
- Promote sustainable outdoor activities, such as hiking, kayaking, open water swimming and more that minimize negative impacts on the environment. This may include providing information and resources to customers about how they can reduce their own environmental impact when participating in outdoor activities, and working with partners to promote environmentally responsible tourism practices.
- Support conservation efforts in the areas where we operate, such as by partnering with local organizations or contributing to habitat restoration projects. This may include donating time, money, or resources to support conservation efforts, and working with local authorities and stakeholders to promote the protection and preservation of natural areas.
- Regularly review and update our environmental policies and practices to ensure that we are meeting or exceeding industry standards and regulatory requirements and that we are taking a proactive approach to protect the environment.

Business Ethics

The purpose of the code of ethics: "Our code of ethics reflects our commitment to conducting business in a responsible and ethical manner, in alignment with our purpose of delivering the best possible outdoor experiences for our customers and stakeholders. We believe that ethical behaviour is essential for building trust and maintaining a positive reputation, and we expect all of our employees to uphold these principles in their daily work.

Expectations for our Team

As a Team member of our company, you are expected to adhere to the highest standards of ethical conduct. This includes acting with honesty, integrity, and respect in all of your interactions, and following all laws, regulations, and policies that apply to your work. You are also expected to report any breaches of the code of ethics or other unethical behaviour that you become aware of, and to cooperate fully with any investigations related to such breaches. We believe that every team member has a role to play in upholding the integrity of our company, and we expect all of our team members to take this responsibility seriously.

OUR COMMITMENT TO ETHICAL BUSINESS PRACTICES

"At Ballyhass Adventure Group, we believe that conducting business ethically is essential to our success and to the trust that our customers and stakeholders place in us. To that end, we will take the following actions:

- Promote transparency and honesty in all business dealings, including by clearly disclosing any conflicts of interest or potential biases. This may include regularly reviewing and updating our policies and procedures to ensure that they are transparent and clear, and being open and forthcoming when communicating with customers, clients, and other stakeholders.
- Treat customers and clients with respect and fairness, and avoid any deceptive or manipulative sales practices. This may include providing accurate and complete information about our products and services, and being transparent about any fees or charges that may be associated with our products or services.
- Protect the company's confidential and proprietary information, and respect the intellectual property of others. This may include implementing measures to safeguard confidential information, such as using encryption and secure servers, and respecting the copyrights, trademarks, and patents of others.
- Avoid any illegal or unethical activities, such as bribery or fraud, and report any concerns about such activities to the appropriate authorities. This may include establishing clear policies and procedures for reporting any concerns about unethical behaviour, and providing employees with resources and guidance on how to handle situations that may involve potential violations of the law or company policies.
- Foster a culture of ethical behaviour within the company. This may include providing training and resources to help employees understand what constitutes ethical behaviour, and establishing policies and procedures to ensure that employees are held accountable for their actions.

Political Activity

As an outdoor company, we believe that it is important to be engaged in the issues that affect our business and our customers. However, we also recognize that political activity can create potential conflicts of interest or other ethical concerns. To ensure that our political activities are consistent with our values and the interests of our stakeholders, we have established the following guidelines:

- politically active on their own time and at their own expense.
- influence political decisions or gain personal advantage.
- conflict of interest or the appearance of a conflict of interest.

We believe that these guidelines will help us to participate in the political process in a responsible and ethical manner, while also protecting the integrity and impartiality of our company.

Anti bribery & Corruption

Our company is committed to the highest standards of ethical conduct, including compliance with all laws and regulations that prohibit bribery and corruption. We believe that these activities are fundamentally incompatible with our values, and we will not tolerate any form of bribery or corruption within our organization.

In accordance with this commitment, we have established the following guidelines to help prevent and detect bribery and corruption:

- person or entity.
- and corruption, including all relevant bribery acts.
- managing such conflicts.

We believe that these guidelines will help to ensure that our company maintains a culture of integrity and compliance, and we encourage all of our team members to report any concerns about bribery or corruption in accordance with our confidential reporting process



- Team Members are encouraged to exercise their right to vote and to be

 Team Members are prohibited from using company resources, including time, money, or facilities, to support or oppose any political candidate, party, or issue.

- Team Members are prohibited from using their position or company status to

Employees must disclose any personal political activities that may create a

- Employees must follow all laws, regulations, and policies related to political activity, including campaign finance laws and lobbying regulations.

- Team members are prohibited from offering, promising, giving, or accepting any form of bribe or improper advantage, directly or indirectly, to or from any

- Employees are expected to report any attempts by others to bribe or corrupt them, or any suspicious activities that may be related to bribery or corruption.

- Employees must follow all laws, regulations, and policies related to anti-bribery

- Employees must disclose any potential conflicts of interest that may arise in connection with their work, and must follow the company's policies on

Transparency

Transparency is a cornerstone of ethical conduct, and we believe that it is essential for building trust and credibility with our stakeholders. To promote transparency in our company, we have established the following guidelines:

- Team members are expected to be open and honest in their communications, and to provide accurate and complete information to customers, business partners, and colleagues.
- Team Members must disclose any potential conflicts of interest that may arise in connection with their work, and must follow the company's policies on managing such conflicts.
- Team Members must comply with all laws, regulations, and policies related to financial reporting, including requirements for the accurate and timely disclosure of financial information.
- Team members must cooperate fully with any internal or external investigations or audits, and must not obstruct or interfere with such processes.

We believe that these guidelines will help to ensure that our company operates with transparency and integrity, and we encourage all of our Team Members to report any concerns about transparency in accordance with our confidential reporting process.

Our Partners









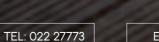














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